6989
SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

WEDNESDAY, APRIL 20, 2005

8:30 A.M.

(PAGES 6989 THROUGH 7054)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 6989

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Mesereau is listed as “M” on index. Ms. Yu is listed as “Y” on index.
Mr. Sanger is listed as “SA” on index. Mr. Oxman is listed as “O” on index.

PLAINTIFF’S WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
BARRON, Brian	6992-A	7025-SA		

E X H I B I T S

FOR	IN		
PLAINTIFF’S NO.	DESCRIPTION	I.D.	EVID.
300-335	Black notebook containing Neverland Ranch logs 7004 7014		

Santa Maria, California
Wednesday, April 20, 2005
8:30 a.m.

THE COURT: Good morning.
COUNSEL AT COUNSEL TABLE: (In unison)
Good morning, Your Honor.
THE COURT: You may proceed.
MR. AUCHINCLOSS: Thank you, Your Honor.
People will call as our next witness Brian
Barron.
THE COURT: When you get to the witness
stand, remain standing.
Face the clerk and raise your right hand.

BRIAN BARRON
Having been sworn, testified as follows:

THE WITNESS: I do.
THE CLERK: Please be seated. State and
spell your name for the record.
THE WITNESS: Brian Barron, B-a-r-r-o-n.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. AUCHINCLOSS:
Q. Good morning, Mr. Barron.
A. Good morning. 6992

Q. Who do you work for, please?
A. Currently I work for the City of Guadalupe as a police officer.
Q. How long have you been a police officer?
A. About six and a half years.
Q. And for the City of Guadalupe that entire time?
A. Correct.
Q. At some time in your past, were you an employee of Neverland Ranch?
A. Yes.
Q. And what did you do for Neverland Ranch?
A. I was a security officer there.
Q. How long were you a security officer at Neverland?
A. For about five, five and a half years.
Q. Was that continuous or sporadic?
A. It was sporadic. It was over three periods of time.
Q. Can you characterize approximately what those three periods were?
A. I started in the fall of 1997. Worked for about a year. I was in the police academy at that time. I then got hired by Guadalupe Police Department. Left the ranch for about a year. And then went back again about nine or ten months after that, and was there for about three years, three and a half years. 6993

Q. And when did you ultimately leave your employment at Neverland?
A. It was about April or May of last year.
Q. And whose decision was that to leave?
A. Mine.
Q. Tell me what your duties were as a security officer at Neverland Ranch.
A. Our duties consisted of the ranch itself, securing the ranch itself, the guests on the ranch, the owner of the ranch, and anything that had to do with the ranch as far as first aid, security. Anything that we could do to help, we would do. But mostly it was to secure the ranch, the owner, and the guests that were there, the employees.
Q. Did you have set days and hours that you worked?
A. Generally, yes. Hours, yes. At times the days weren't always set, but hours, yes.
Q. So during your time working there, did you always work days or nights? Or you tell me.
A. Generally I worked nights for the entire time I was there.
Q. And tell me what a night shift would consist of.
A. Night shift would consist of 6 p.m. to 6:30 a.m. And then we would do rotating shifts at the front gate. And then we would do -- which would be about four hours per person at the gate. And then 6994

secure the ranch after you've done your -- before or after you've done your gate time.
Q. So if you would, if you can, give me a description of an evening of work at Neverland Ranch from the time that you check in to the time that you finish your evening's work and you go home. And I'm interested in particularly where you go, where you are on the ranch at various times.
A. Okay. If I were to get there at 6 p.m. and were to take the first shift at the gate, I would be at the gate from 6 p.m. till about 10:15. And that would be checking in and out people who are coming in and off the property, answering phones, doing whatever was necessary there.
Q. So when you'd come to work, there's a gate that is -- approximates the perimeter of the property, is that --
A. Correct.
Q. Or is that inside the property?
A. No, that would be the guard house at the front gate. So you'd come in the gate there and there's a guard.
Q. Okay. There's a house there, a guard house?
A. Yeah.
Q. And when you'd come to work, would you just check in at the gate and stay there, or would you go to the main house first and go back to the gate?
A. Sorry. We'd go to the main house first, get 6995

any pass-on information that was going to happen
that we needed to know that had happened on the
prior shift or the things that we needed to know
from the oncoming shift. That would be just
speaking with the officers who were there at the
house office. Security office.
Q. And where is that located?
A. If you can imagine the entire house
property, and if you were looking at it from the
front, it would be on the far left. Sorry, it would
be on the far left of the building. There's a main
house, a walkway, Mr. Jackson's office, video
library, and the security office.
Q. So the security office is contiguous to the
main house structure?
A. By way of a breezeway.
Q. Okay. And access to the security office, is
that an exterior door or an interior door?
A. It's an exterior door.
Q. Does it have any interior connection to
other parts of that structure?
A. No.
Q. When you go in the security office, how many
rooms are there?
A. There's two.
Q. And could you describe them for me?
A. First room would be -- had a desk in it.
Had a computer in it. So it technically had two 6996

desks in it, one on each side of the wall. There was a window that faced out towards the front property, the front lawn area of the house. And then as -- that would be basically the inside of that room. There was also in that room a grease board that we put pass-on information on, guest information on. And then as you go into the next room, it was basically a break room. There was lockers, refrigerator, and a table to eat on.

Q. What was the computer used for in the first room you mentioned?

A. Mostly what we used it for was generating our forms that we use on a daily basis, accident forms. It wasn't really used for much. We would create, like, reports on that computer, security reports, anything that had to do with us. If there was a -- you know, we noticed damage to something on the property, we would write it up on the computer there. But that was mostly what that computer was used for.

Q. All right. So moving back to our chronology of a day in the life of a security guard. You check with the main office. If you have gate duty, you go out to the gate. What next?

A. If you don't have gate duty, then you would start your regular patrols. First thing you would do when you got on the property was make sure -- you know, we would know who was there, if we had 6997

guests, if the owner was on the property. And we would check all of the doors around the house first. We'd do a check of the house area, make sure all the doors were locked, everything was in order. If buildings needed to be opened, that those buildings were opened around the house area. And then we would -- after completing that check, we would do a similar check to the rest of the properties on the residence, any other buildings on the residence.

Q. If you're on patrol, would you be doing continuous checks?

A. Hourly checks.

Q. And what would you be doing between those checks?

A. Stuff to keep busy. We did a lot of training. The fire department, they're trained regularly, and we would assist with that. We were all basically part of the same group.

Q. How many security guards are on duty during an evening shift?

A. When I was working there, it was between three and four.

Q. How many on a day shift?

A. About the same.

Q. And as far as the next thing you'd do in your evening's work, would you continue to do these security checks throughout the evening?

A. That's correct. 6998

Q. How many would you do in an evening?
A. If we did one an hour, 12. If we did more, just -- it would depend on need.
Q. Okay. And where would a security check take you on the property?
A. Everywhere.
Q. Would different officers check out different areas?
A. No. We'd check all -- being there would only be two of us at the house. If there was three of us working, there would be one of us at the gate and two of us at the house office. If there were guests or anyone on the property that was in -- at the house area, we would -- one of us would stay there, and the other one would check all the doors on the residence, all the buildings -- on the property, excuse me, everything.
Q. As far as checking the doors of the main residence, would you have -- did you have a key to the main residence?
A. Yes.
Q. And what door did that open?
A. The back door.
Q. Okay. As far as -- did -- the main residence has a punch card that can --
A. A key pad.
Q. -- that can give you access?
A. Like a telephone pad. 6999

Q. Did you have the code to that key pad?
A. No.
Q. Did you have the code to the key pad that gave access into Mr. Jackson's private suite?
A. No.
Q. Did any of the security guards, as far as you know?
A. Not that I'm aware.
Q. When you'd work in the security guard booth at the entrance to the property, tell me about what your duties would be there.
A. Duties there were generally letting people on and off the ranch. We had paperwork that would allow us -- that we would know ahead of time who was allowed to come on the ranch, whether that would be guests, or it would be general deliveries, contractors, things of that nature. We would know who was coming and who was supposed to be there for that day, so we would have those people come on and off.
We also checked in all the employees and checked out all the employees, times they were in, times they were out. Every time they came or left the property.
Answering phones was a large part of it. The majority of the phone calls that came in, especially in the evening time, they all came basically through us. 7000

Q. When you were conducting your duties as a security officer at Neverland, did you have occasion to see the owner of the property?
A. Yes.
Q. And that would be Mr. Jackson?
A. Yes.
Q. Is he seated to my right, the man with the black hair?
A. Yes.
Q. And how much would you see Mr. Jackson on the property, assuming -- let me strike that question.
How often would you see Mr. Jackson on the property during those times when he was visiting Neverland or staying at Neverland?
A. Daily. At least.
Q. Okay. And would you be able to see him -- would you see him interacting with guests when they were on the property?
A. Occasionally.
Q. Would you ever talk to Mr. Jackson personally?
A. Only if I needed to.
Q. Okay. And how often would you have contact with him?
A. Not on a regular basis. Only if there was something pressing that he needed to know or we needed to ask him. We tried to let him have his 7001

privacy when he was there.
Q. You mentioned forms that are prepared on the computer. Are there daily logs that are kept at Neverland?
A. Yes.
Q. What are the daily logs?
A. The daily logs that we kept at the gatehouse, where those logs were kept always, was the employee entry list, the daily activity list, which would include, like I said, anybody other than employees coming on and off the property, which would mean anything -- general contractors, deliveries, anything like that, any guests that were on the property.
Also our time checks for all of the -- we would call in the start of a check of the ranch, a security check, all the doors, and we would call in anything that would happen that we would find out of the ordinary and log that at the gate. And then the end of that check also.
Q. Were these logs used during the entire I believe four years that you said you worked there?
A. About five years. Yes.
Q. Five years you worked there?
A. They changed. At times they looked different, but they were basically the same.
Q. What about accident reports? You mentioned those. How are they prepared? 7002

A. In the same fashion. We would -- initially we would let whoever was at the gate know that we found something or something had happened, somebody had wrecked one of the golf carts or fallen down, whatever the case may be. We would let -- either the gate would let us know, because they called the gate, or we would let the gate know, because we were notified at the house. And then we would prepare that form after the conclusion of whatever was going on.

Q. How often would you have to prepare accident reports?

A. Not often. I didn't prepare very many. The day shift usually prepared more, because more things -- there's more people, more activity on the ranch, more employees. More guest activity during the daytime generally. But, you know, a couple times a month.

Q. You mentioned they'd be prepared if a golf cart was wrecked?

A. Uh-huh.

Q. Would that be a common occurrence?

A. It happened -- it seemed to happen a lot more than it needed to, yeah.

Q. Why do you say that?

MR. SANGER: Objection, calls for speculation, Your Honor.

THE COURT: Sustained. 7003

Q. BY MR. AUCHINCLOSS: Okay. Was there -- tell me, was there a difference in the attitude and demeanor of employees when Mr. Jackson was on property as opposed to when he was off?
A. Yes.
Q. How would you describe that?
A. Tense.
Q. Can you elaborate on that? Why would employees be tense?
A. Well, they would have to get there earlier usually. They'd have more work to do. He was -- he's very -- at least the way I feel, is he's very -- like a perfectionist, everything has to be right. His property, his prerogative to be that way. But there was a lot more work to be done. Everybody just seemed to be walking on pins and needles a little bit more just to make sure things were right.
MR. AUCHINCLOSS: Madam Clerk, do we have a notebook with Exhibits 300, et seq.?
THE CLERK: Yes.
MR. AUCHINCLOSS: Thank you.
May I approach, Your Honor?
THE COURT: Yes.
Q. BY MR. AUCHINCLOSS: Mr. Barron, I show you a black notebook that appears to have numerous records in it. It is labeled as Exhibits 300 through 335. I'd like you to take a moment and look 7004

at that.
I don't really want you to look at every
exhibit, but --
A. That's all right.
Q. If you could just kind of thumb through it
quickly.
A. They look very familiar.
Q. All right. Have you looked at a notebook
like that?
A. Yes.
Q. And can you identify those records for me,
please?
A. Yes. They are the employee in-and-out logs,
the gate activity logs, and the daily entry access
logs.
Q. And are these the type of logs that you were
talking about when you said that you personally
would prepare records at Neverland?
A. They are the logs.
Q. Okay. Now, just to help us a little bit
with the various types of forms here, looking at
Exhibit No. 300, the first page, can you tell us
what that is, please?
A. That's an accident or damage report.
Q. All right. And is that the type of report
that would be prepared by a security officer in his
normal duties at Neverland Ranch?
A. Yes. 7005

Q. Did you yourself ever prepare these reports?
A. Yes.
Q. Does this look to be an authentic copy or an authentic document as far as an accident damage report?
A. Yes.
Q. Would these reports, the accident damage reports, be prepared in the normal course of your duties as a security officer at Neverland Ranch?
A. Yes.
Q. When would these reports be prepared in relation to the accident that they are describing?
A. Generally right after, or very soon after the -- whatever happened happened.
Q. And is the information -- does the person who prepares these reports have a duty to accurately describe what is in the report itself?
A. Yes.
Q. Moving on to Exhibit 301, it appears to be -- it appears to be a daily log.
A. Uh-huh.
Q. Is that, in fact, what it is?
A. Yes.
Q. And tell me what type of daily log this is.
A. This would be the employee in-and-out entry and exist list. So the time you were in and time you were out, if you were there overnight. You notice there's "CO" here, carry-over, you were 7006

carried over from the midnight hour to the next day.
Q. Okay. And there are numerous names on there?
A. Yes.
Q. Are those the names of the employees at Neverland?
A. Yes.
Q. And the written in information, in and out, depicts the time that they checked in and the time they checked out?
A. Correct.
Q. Again, this is a report that's prepared in the ordinary course of your duties as a security officer?
A. Yes.
Q. And does the security officer have a duty to accurately record the information in this report?
A. Yes.
Q. And is it prepared at or near the time of the entries that are made?
A. At the time.
Q. Okay. Now, there appears to be a -- turning over page 301, on the back of it and on the next page there appears to be a report entitled "Daily Entry Access."
A. Correct.
Q. Tell me what that is.
A. That would be the entry and access of 7007

anybody who normally would come on the ranch. Most of these on the top part of it are deliveries, and then those on the bottom would be the guests who are on the ranch.
Q. Okay.
A. For that day.
Q. Again, the same question. Are those parts of your duties as an officer at the ranch?
A. Yes.
Q. And are they prepared at or near the time of the events recorded in that report?
A. At the time.
Q. And your duty is to prepare those reports accurately?
A. Yes.
Q. Okay. Now, I'm also seeing -- looking at a report now that is on the back page of Exhibit No. 302.
A. Uh-huh.
Q. It's entitled "Gate Activity Log." Tell me what that is, please.
A. The gate activity log is, like I was explaining earlier, when something happens or there's some information that officers need to know or anybody else who may need to know, we would write it down on the gate activity log. The top part of that paperwork is the officer who was working the gate and the time that 7008

they were there. And then the center part is, again, that information that would be necessary for officers to know or to pass along to other people who are coming on and off the ranch, and that information is written down at the time it's given and then there's a time that it's given. If it says, "CO," which again is carry-over, that would mean that's something that needs to be on this list for an extended period of time, so that we're aware of it.

And then the bottom portion is the time we start our checks of the ranch, and then the time we finish the house checks, and then the exterior patrols also.

Q. Okay. I hate to be redundant, but I have to ask you the same questions. Is that prepared in the ordinary course of your duties as a security officer at the ranch?

A. Yes.

Q. Is it a document that is -- that your duty is to accurately describe the gate activity at the time that it is happening or contemporaneous with the information that's in that log?

A. Yes.

Q. And you yourself have filled these logs out and are familiar with how these are prepared?

A. Many of them, yes.

Q. All right. And I asked you previously if 7009

you had reviewed a book similar to this. There's one more page here that I think I'll ask you about. Looking at 320, there is a security clearance and guest information form.
A. Correct.
Q. Tell me what that is.
A. That would be given to the gate. For instance, this one was given hopefully the day before, so it's June 18th of '02, telling us that the next day this gentleman would be coming onto the property, that did he not need to sign a confidentiality form, and then what he was going to be doing or where he needed to go.
Q. Okay. So before you'd let somebody on the ranch, would one of these have to be filled out if they were not already a guest or employee?
A. Yes.
Q. And were you notified beforehand whether to let a guest onto the property or not?
A. Yes.
Q. Would guests be allowed on the property if you did not have a form authorizing their admission?
A. No.
Q. Showing you Exhibit 333, there appears to be an emergency medical report.
A. Uh-huh.
Q. What is that, please?
A. That would be if someone was injured, one of 7010

the firefighters, who were for the most part all
EMTs, would complete one of these forms for the
ranch purposes to have record of whatever the
accident -- where they had been injured had
happened.
Q. Okay. And same questions there, duty to
accurately prepare that information?
A. Yes.
Q. You're familiar with how that information's
prepared?
A. Yes.
Q. You filled those out yourself?
A. I think maybe one I filled out for the EMT
that was working on the person, just handwriting for
them. I never did one of my own.
Q. These are prepared at or near the time of
the event that's recorded?
A. Yes.
Q. And there's a duty to accurately depict the
information on there?
A. Yes.
Q. And then I'm showing you lastly a Neverland
Valley Medical Report Log. Have you ever seen one
of those?
A. Yes.
Q. Tell me what that is.
A. That is a log of all the medical reports
that were done for the year. So all of them had 7011

their incident report number, the date, who took it, the time it was taken, the name of the person, what was -- what happened, the injury, and then what type of treatment they were given.
Q. Okay. The person filling that form out had a duty to prepare it accurately?
A. Yes.
Q. Prepared at or near the time of the act, condition or event that's depicted in the form?
A. Yes.
Q. And you're familiar with how those are prepared?
A. Yes.
Q. Okay. And then I'm showing you -- I don't think we've gone over one of these yet, have we?
A. Again, that's the same, it's just a different looking form. It's the blanket routine form, the guest form, and then ranch -- again, a lot of these forms changed. This is the same form as one of the earlier forms that we looked at.
Q. This is a form in Exhibit 335. It's on the back page of one -- well, on the second page, there appears to be one. So this is a similar form as far as guest activity?
A. It's the exact same, it's just written different.
MR. SANGER: Excuse me, Your Honor. 335 has a number of pages, as far as I can tell. What page 7012

1 are we talking about?
2 MR. AUCHINCLOSS: I had said the second
3 page. Turn the page over and it's on the back side
4 of the first page.
5 MR. SANGER: May I approach, Your Honor?
6 I think the book that we were given may be out of
7 order in 335.
8 THE COURT: Yes, go ahead.
9 MR. SANGER: Thank you.
10 MR. AUCHINCLOSS: Do you have 335? It
11 should be the second page.
12 MR. SANGER: You have it on the back side.
13 MR. AUCHINCLOSS: We doubled it up.
14 MR. SANGER: All right. Thank you.
15 Q. BY MR. AUCHINCLOSS: So all the questions
16 I'd asked you before would apply to this one as
17 well --
18 A. Yes.
19 Q. -- that you've spoken about, guest activity
20 logs and such?
21 A. Yes.
22 Q. Okay. And I previously asked you if you had
23 a chance to review these records. Would your
24 testimony be the same concerning all of the records
25 that are contained in this notebook regarding the
26 accuracy of the information, the duty to prepare
27 accurate information? All these records were
28 prepared at or near the time of the events that were 7013

recorded?
A. Yes.
Q. And you're familiar with their method and mode of preparation?
A. Yes.
MR. AUCHINCLOSS: Your Honor, I'd ask that Exhibits 300 through 335 be admitted at this time.
MR. SANGER: And I take it they're offered as a business record.
MR. AUCHINCLOSS: They are.
MR. SANGER: I have no objection to that foundation.
THE COURT: All right. They're admitted as business records.
MR. AUCHINCLOSS: Thank you.
Q. Mr. Barron, you said when you were doing your daily duties, conducting your daily duties as a security guard, you'd have occasion to see Mr. Jackson on the property?
A. Yes.
Q. Would you have occasion to see him interacting with his guests?
A. Occasionally, yes.
Q. Would you have occasion to see guests when they weren't interacting with Mr. Jackson on the property?
A. Yes.
Q. Do you know an individual by the name of 7014

Frank Tyson or Cascio?
A. Yes.
Q. Who is Frank Tyson or Cascio?
A. From what I originally knew, he was a friend of the family -- of Mr. Jackson's family, or a friend of Mr. Jackson. His family, his parents and brothers and sister were friends. At some point I believe he became an employee of Mr. Jackson. What his exact duties were I don't really know. But he was -- at some point, he became an employee.
Q. And do you have a time frame for when he was an employee, approximate?
A. I would say probably around -- maybe around the year 2000, right around in there.
Q. Okay.
A. And whether he still is or is not, I don't know, but --
Q. Did Frank Cascio ever live at Neverland?
A. He stayed there a lot. Whether he lived there or not, as far as his primary residence, I don't know. But he was there quite often.
Q. Would he stay there longer than a month?
A. Yeah. At times I think he would, yes.
Q. Did you have occasion to observe his relationship with Mr. Jackson?
A. Not on a real personal level, between the two of them, no.
Q. Did you see them together? 7015

A. Yes.
Q. Would Mr. Cascio ever spend time in Mr. Jackson's bedroom?
A. I have no idea.
MR. SANGER: Objection; calls for speculation, Your Honor.
MR. AUCHINCLOSS: I'll withdraw that question. And you can strike the answer, that's fine.
MR. SANGER: So moved.
THE COURT: All right. So granted.
Q. BY MR. AUCHINCLOSS: Do you feel that you could -- you have sufficient information to describe their relationship?
A. Yes.
Q. And how would you describe their relationship?
A. I would describe it --
MR. SANGER: I would object as no foundation. I believe he said he didn't observe their relationship.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: When you said you observed them together, where would you observe them?
A. Generally on the ranch, in the movie theater. I'd seen them riding the quads on the ranch before. Just doing general activities. In 7016

1 the park, I'd seen them in the park before, the
2 theme park.
3 Q. How many times do you think you'd seen them
4 before, approximately, if you can estimate?
5 MR. SANGER: I'm going to object as vague as
6 to time.
7 Q. BY MR. AUCHINCLOSS: During the entire
8 period of time that you were a security guard.
9 A. Maybe 75 to 100 times. I mean, in passing I
10 would see them together.
11 Q. And did you -- how many times -- if you
12 could estimate, how many nights during that period
13 of time, five-year period of time, did Frank Cascio
14 spend at Neverland?
15 A. Oh --
16 MR. SANGER: Well, I'm going to object as
17 lack of foundation.
18 THE COURT: Sustained.
19 Q. BY MR. AUCHINCLOSS: You said that you were
20 familiar with the logs in terms of who was staying
21 on the property?
22 A. Yes.
23 Q. Was that part of your daily duties?
24 A. Yes.
25 Q. When Frank Cascio visited the property,
26 would he be noted in that log as a visitor spending
27 the night?
28 A. Yes. 7017

Q. On how many occasions, could you estimate, did Frank Cascio spend the night during that five-year period?
MR. SANGER: I'm going to object as lack of foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: Hundreds.
Q. BY MR. AUCHINCLOSS: Who is Vinnie? Do you know an individual -- let me start with that. Do you know an individual who visited Neverland named Vinnie?
A. Yes.
Q. Who was Vinnie?
A. As far as I know, Vinnie was a friend of Frank.
Q. And do you know the period of time when Vinnie visited Neverland?
A. No, not offhand I don't.
Q. Do you know approximately -- did Vinnie spend the night at Neverland?
A. Yes, I do know that he spent the night occasionally at Neverland Ranch.
Q. Do you know how many nights he spent?
A. No.
Q. Do you know an individual by the name of Marc Schaffel?
A. Yes. 7018

Q. How do you know Mr. Schaffel?
A. Just from his coming to the ranch.
Q. Do you know how often he would visit the ranch?
MR. SANGER: Vague as to time.
Q. BY MR. AUCHINCLOSS: During the period of time that you were a security guard.
A. Not very often, but he would come probably three or four times a year maybe.
Q. Do you know an individual by the name of Ronald Konitzer?
A. I know the name.
Q. Okay. Did you ever meet him?
A. Not that I'm aware of.
Q. How about Dieter Weizner?
A. Yes.
Q. Did you meet Mr. Weizner?
A. Yes.
Q. Where did you meet him?
A. At the ranch.
Q. And if you can characterize, again I'm asking for your best estimation, if you can provide it, how many times did Mr. -- did Dieter visit the ranch?
A. Several times. He was there -- he would stay sometimes for a couple of days, and then he'd be gone for a while and come back. It wasn't a regular thing that he was there. For a short period 7019

of time it was, maybe two or three months I believe
he was there on a somewhat regular basis, but
generally it was off and on.
Q. Can you characterize the period of time that
you observed Dieter on the ranch in terms of the
five years you were there?
A. It would have been --
Q. Beginning time to when you left.
A. Probably sometime in 2002 to 2003.
Q. Okay. Now, did you have occasion to see
children visit the ranch?
A. Yes.
Q. How were children treated at the ranch?
A. Well.
Q. What do you mean by that?
A. It was a fun place to go. They got to do
pretty much whatever they wanted, for the most part.
Not all of them. But they were treated quite well.
Q. Are you familiar with some visitors to the
ranch who were local residents of Los Olivos?
A. Yes.
Q. Do you know their names?
A. Um, I can’t remember right now.
Q. How many were there?
A. Three.
Q. Were they boys or girls?
A. Boys.
Q. What ages? 7020

A. Teenage.
Q. Were any of them related?
A. Two of them were.
Q. And how often would they visit the ranch?
A. For a short period of time quite regularly.
MR. SANGER: Do you have numbers on those?
MR. AUCHINCLOSS: 45, 46, and 47.
Q. Mr. Barron, I show you People's 45. Does
that look -- can you recognize that?
A. Yes, I recognize that.
Q. And who would that be?
A. His name -- their names are completely --
Q. Is that one of the people you're talking
about?
A. Yes.
Q. How about 46?
A. Yes.
Q. Is that one of the boys you're talking
about?
A. Yes.
Q. 47?
A. Yes.
Q. Okay. Did you have occasion to see how
those young men conduct themselves at the Neverland
property?
A. Yes.
Q. How would you describe their conduct?
A. Destructive. 7021

Q. And why do you say that?
A. Whenever they were there, we had broken carts. Damaged carts. They at some point egged -- threw eggs at my security chief's car, inside, outside, we're talking dozens of eggs. There just always seemed to be something broken or some problem when they were there.
Q. Do you know if they ever got in trouble for this type of conduct?
MR. SANGER: Objection; lack of foundation.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: You mentioned a grease board at the security office.
A. Yes.
Q. And what specifically was that grease board used for?
A. Specifically it was for guest information, names of people who were in which guest unit or where they were staying on the ranch. And then a pass-on board, just write notes on the board for the oncoming shift or something that happened, just so that it was remembered. Anything that we needed to remember on a daily basis could have been put up on that board.
Q. Who was your supervisor?
A. I had -- Violet Silva was the security chief, and then Curtis Gordon was a supervisor and Julio Magana was a supervisor. 7022

Q. Did you have any supervisorial capacity as security guard?
A. Yeah, I had a shift supervisor. Curtis and Julio would work generally day shift. And then when I was there in the evening, I would be the shift supervisor. They were supervisors to me, but I would be in charge of the shift at night.
Q. Okay. At some point -- and let me just make -- be clear. What do you mean when you say "grease board"?
A. A white -- a white board that you use the wipeable ink markers on.
Q. Okay. So like a chalkboard or similar but you can --
A. Similar, yes.
Q. -- but you can wipe the ink off?
A. Yes.
Q. At some point during your employment at Neverland, did you see a directive on that board concerning Gavin Arvizo?
A. Yes.
Q. Do you know who Gavin Arvizo is?
A. Yes.
Q. First of all, tell us how you know Gavin Arvizo.
A. Because he was a guest at the ranch.
Q. Okay. So you knew him by sight?
A. Yes. 7023

Q. And tell us what that directive was.
A. It simply stated, “Gavin is not allowed off property.”
Q. Can you tell me the approximate time that -- your best recollection as to when that -- when that directive appeared on the grease board?
A. It was early part of 2003, January, February.
Q. Do you know the exact date?
A. No.
Q. Do you know how long it was on the grease board?
A. I remember it being approximately a week.
Q. Okay. If Gavin Arvizo appeared at the front gate during this period of -- well, let me back up, first of all. What did that directive mean to you in terms of a security officer?
A. That we weren’t to allow him off property without some sort of permission from a supervisor.
Q. Okay.
A. That would be -- I would check first.
Q. Okay. So if Gavin Arvizo appeared at the gate, walking out of the ranch, would you let him pass?
A. No.
Q. If Gavin Arvizo appeared at the gate being driven out by Jesus Salas, would you let him pass?
A. I would check first with the ranch manager. 7024

Q. So would you say you wouldn't let him pass before getting authorization?
A. No.
MR. SANGER: Well -- I'll withdraw it.
THE COURT: All right.
MR. AUCHINCLOSS: Thank you. I have no further questions.

CROSS-EXAMINATION
BY MR. SANGER:
Q. Mr. Barron, how are you?
A. Good.
Q. You're a sworn peace officer; is that correct?
A. That is correct.
Q. And you went to the Allan Hancock Police Academy?
A. Yes.
Q. And you have been a police officer, an active duty police officer with the Guadalupe Police Department for how long?
A. Six and a half years.
Q. And during the entire time that -- I'm sorry, during the entire past six and a half years consecutively, you have been a police officer, correct?
A. That's correct.
Q. So at no time during the last six and a half 7025

years have you not been a sworn peace officer?
A. Correct.
Q. You worked at Neverland while you were going
to the academy, correct?
A. That's correct.
Q. And then after you finished the academy, you
got a job with Guadalupe as a sworn peace officer,
correct?
A. Correct.
Q. And when was that?
A. The day I started with Guadalupe?
Q. Sure.
A. September 28th of 1998.
Q. Okay. So since September of 1998 to the
present, you've been a sworn peace officer?
A. Correct.
Q. And sometimes you worked at Neverland Ranch
as a security person as well; is that correct?
A. Correct.
Q. So you were moonlighting, as it were?
A. Yes.
Q. And at some point you were aware that there
was a raid on Neverland; is that correct?
A. Yes.
Q. Were you there that day?
A. No.
Q. After you learned there was a raid at
Neverland, did you have a discussion with your chief 7026

of police at Guadalupe?
A. Yes.
Q. As a result of that discussion with the chief of police, did you determine that you should resign your position as a security guard?
A. Yes. It was more like step away from it for a while.
Q. Okay. In other words, between you and your chief, you decided there's an ongoing criminal investigation, as a peace officer, you probably should not also be working at the ranch; is that correct?
A. At that time that's what I decided, yes.
Q. And when was that, approximately? Was that right after the raid?
A. I was on vacation at that time, at the time of the search warrant. And then so shortly after I came home from vacation.
Q. All right. So sometime maybe end of November?
A. What day was the raid?
Q. November 18th, 2003.
A. Yeah. Correct. I think I came home from vacation the last couple days of November, so shortly after that. Maybe the first week of December.
Q. All right. And you did not cease your employment -- I was going to say quit, but you 7027

actually stepped away for a while, you took a leave?
A. Yes.
Q. You did not do that because you had seen anything unlawful at the ranch; is that correct?
A. That's correct.
Q. And in fact, had you seen anything unlawful at the ranch from 1998 to the time that you stepped away from the job, you would have been duty-bound to report that, correct?
A. Absolutely.
Q. And in fact, as a sworn peace officer, you probably -- if you saw a criminal activity, you probably would have been duty-bound to either investigate or even make an arrest; is that correct?
A. Yes. To a point.
Q. Okay. At the very least report it?
A. Correct.
Q. All right. And you had no -- you found no need whatsoever to do that the entire time that you were there; is that correct?
A. That's correct.
Q. The people at Neverland Ranch that you worked with were made aware that you were a police officer; is that correct?
A. They all knew.
Q. All right. There was no secret?
A. No secret.
Q. And you were given access to every part of 7028

1 the ranch that any other security officer was given
2 access to; is that correct?
3 A. That's correct.
4 Q. You reported, you said, to Mr. Magana and
5 Mr. Gordon?
6 A. Correct.
7 Q. And then Violet Silva was the chief of
8 security at the time; is that correct?
9 A. Correct.
10 Q. Did you have a good relationship with Violet
11 Silva?
12 A. Very good.
13 Q. And was she a professional chief of
14 security?
15 A. Yes.
16 Q. All right. Now, I know that a lot of times
17 law enforcement might look at security guards as --
18 somewhat cynically, is that true?
19 A. Absolutely.
20 Q. Did you feel that this security department
21 was run in a professional fashion?
22 A. Yes.
23 Q. To a certain extent, the security department
24 included the use of various police procedures; is
25 that correct?
26 A. To a small extent, yes.
27 Q. General radio etiquette, for instance?
28 A. Yes. 7029

Q. Making sure that you logged things in appropriately?
A. Correct.
Q. Did Violet Silva, for instance -- let's take her. Did Violet Silva insist that the people under her command, as it were, keep accurate records?
A. Yes.
Q. All right. Did Violet Silva insist that the people under her make sure that the various places on the ranch were secure?
A. Yes.
Q. And there was a regular detail, or a regular -- let me withdraw that. There was a regular procedure to go through and check the various locations during the evening and the night to make sure that the ranch was secure; is that correct?
A. That's correct.
Q. Now, during the time you were there, was there a risk that intruders would get onto the ranch?
A. Absolutely.
Q. Did any intruders get onto the ranch during the time that you were there?
A. Yes.
Q. Were there ever occasions that you were aware of that intruders actually got to the house?
A. Yes. 7030

Q. Did any intruders actually get into the house?
A. Yes.
Q. Were law enforcement officers called eventually to deal with those intruders?
A. Yes.
Q. In fact, that was the protocol, if you found somebody trespassing, to call for law enforcement?
A. Correct.
Q. Now, I understand you were law enforcement, but you would call the sheriff's department at that point, correct?
A. Yes.
Q. And I may be going a little fast and then you're kind of stepping on the end of my questions, and I may be asking too quickly. It makes it hard for the court reporter.
A. I apologize.
Q. That's all right. I apologize. We'll just slow down a little bit, both of us.
All right. Now, you explained the situation out there and I just want to go over it in a little more detail. There are basically two main security posts, stationary posts at the ranch; is that right?
A. That's right.
Q. There's the gate, which is the little house right by the big front gates, correct?
A. Correct. 7031

Q. Now, at that little house, and the big front gates, there's -- or in the -- in the little house there's a computer and a desk; is that correct?
A. That's correct.
Q. Telephone?
A. Yes.
Q. Is the phone often answered by -- at that phone?
A. Yeah. A lot.
Q. All right. So people calling into the ranch, particularly at night, the phone will ring there, and the security guard at that phone will answer it; is that correct?
A. That's correct.
Q. All right. And then the phone -- the phone can be -- or the call can be forwarded from that phone to other phones?
A. Any -- basically any phone on the ranch.
Q. And the phone that's at the gate is a regular telephone within that -- let me back up. There's a system and the phones are pretty --
A. It's a multiline phone.
Q. They're pretty much identical phones throughout the ranch?
A. Yes. I believe they're all the same.
Q. So this is -- this is not a big phone with a lot of buttons on it. It's a smaller phone; is that correct? 7032

A. That's correct.
Q. So you get an incoming call and then you would forward it by using a code to forward it; is that correct?
A. Transfer it to whatever extension it needed to go to.
Q. All right. The gates at the guard house there are big iron gates, is that correct, the front gate?
A. Well, maybe on the inside. They're wood.
Q. Or wood gates. I'm sorry, I think you are right. They're big wooden gates, in any event?
A. Yes.
Q. And they're anchored by, I think, stone walls on either side; is that correct?
A. Yes.
Q. If you stand at the gates looking out to Figueroa Mountain Road, to the road there, and you were to go to the left of the guard house --
A. Okay.
Q. -- as you're looking out to the left of the guard house, how far does the stone work extend, roughly?
A. Maybe 20, 25 feet. 30 feet maybe at the max.
Q. Okay. And after that 30 feet, what kind of fencing protection do you have?
A. Very little. Two-plank ranch fencing. 7033

It’s nice. It looks like -- but it’s maybe about four feet tall.
Q. And two rails?
A. Two rails and then posts however many feet.
Q. And there’s no wire on that or anything else, correct?
A. No.
Q. So people can pretty much hop over that if they want to?
A. Yes.
Q. All right. As you go around the rest of the ranch there’s -- as you get farther away from the gate, at some point there’s some fencing, cattle-type fencing; is that correct?
A. Cattle, barbed wire fencing.
Q. All right. Now, you mention that there was another location which was up by the house, I think, for -- another stationary location for the guards; is that correct?
A. The house security office, correct.
Q. And that’s not in the house itself?
A. No.
Q. It’s at the end of the building that’s adjacent to the house; is that correct?
A. Correct.
Q. And in there, you have a -- an initial room that includes a desk and the computer and so on; is that correct? 7034

A. That's correct.
Q. And there's a rack of battery chargers for the portable radios?
A. It may be in that room, now. It was in the other room before when I was there.
Q. Okay. In any event, there's the initial room that you walk into, and then behind it is sort of a break room; is that correct?
A. Correct.
Q. It's got a few lockers; is that right?
A. That's right.
Q. The break table and some chairs, right?
A. Yes.
Q. Is that where that board is that you were telling us about?
A. No. It was in the first room.
Q. In the first room. All right.
Now, let me ask you something: The gate logs that you told us about that are among the documents that you authenticated from Exhibit 300 to 335 -- I realize there's some other documents that aren't gate logs in there --
A. Yes.
Q. -- but the gate logs that are in those documents, those gate logs are used to communicate information to the various guards who are on duty or who come on duty; is that correct?
A. Yes. 7035

Q. All right. Now, I realize -- or let me ask you this: You had previously told law enforcement that you believed that this -- what you called or what Mr. Auchincloss called a directive, that this note about Gavin Arvizo was on the grease board?
A. Yes.
Q. And are you aware that none of the other officers recall seeing it on the grease board?
MR. AUCHINCLOSS: Objection. That assumes facts not in evidence.
THE COURT: Sustained.
Q. BY MR. SANGER: Are you aware of any other officer who claims to have seen that on the grease board?
A. Yes.
Q. Okay. Is it possible that this particular notation was, in fact, on a gate log instead of the grease board?
A. I'm sure it was on a gate log.
Q. Okay. And in fact, it's on the gate log for February the 19th; is that right?
A. I don't know the date that it's on there.
Q. You remember seeing it on the gate log; is that correct?
A. No.
Q. Okay. You said it was on the gate log?
A. I now know that it was on the gate log.
Q. Okay. All right. Do you have the book up 7036

there, the --
MR. AUCHINCLOSS: It's right here.
MR. SANGER: This is the official book. All right.
Q. Now, you say you're aware it's on the gate log. Did somebody show it to you?
A. I was told.
Q. By the prosecution?
A. Yes.
Q. Okay. And who told you that?
A. The District Attorney.
Q. Which one?
A. Auchincloss.
Q. Mr. Auchincloss.
A. Thank you. Sorry.
MR. SANGER: Okay. Your Honor, what I'd like to do, I'm going to take this page out of the book, the entire book has been admitted, and there are exhibit tabs, official court exhibit tabs on the first page of each exhibit. So I am taking a page out of 334. And at the bottom, this page says "MJ 00154." And I'd ask permission to put this up on the screen, if I may.
THE COURT: You may.
MR. SANGER: Thank you.
Q. I'll back up, first of all. I'll represent to you I just took that -- as I said to the Court, I took that out of the book here. That's one of the 7037

various pages. Does that appear to be a gate activity log?
A. Yes.
Q. And there's a number up on the top which we'll focus in on a little more. It says 2-19-03. It's a little fuzzy there, but --
A. Correct.
Q. And the purpose of this gate activity log would be to record pretty much contemporaneously activities that occurred during the security shift; is that true?
A. That's correct.
Q. And it's also for the purpose of recording information that should be communicated to other officers on other shifts; is that correct?
A. Yes.
Q. All right. Now, I'm going to, with any luck, focus in so we can read it, but we'll see about that.
Okay. Do you see there, it says -- three lines up from the bottom, on the middle of the page, it says 1752.
A. Yes.
Q. What does 1752 represent?
A. 5:52 p.m.
Q. Military time. So it's 5:52 in the afternoon, correct?
A. Correct. 7038

Q. That would be the time that somebody recorded the information on that, on that line adjacent to it; is that correct?
A. Correct.
Q. And the line adjacent to it says, “The kids are not to leave per Joe.” “Kids” meaning like Gavin, Star, et cetera, correct?
A. Correct.
Q. All right. Were you aware that that particular evening was the evening that these children were to go down to Los Angeles?
MR. AUCHINCLOSS: Objection; assumes facts.
MR. SANGER: That’s --
THE COURT: Foundation; sustained.
MR. SANGER: Well, I asked if he was aware. Should I rephrase it? Let me do it this way, Your Honor. I won’t make that request.
THE COURT: The foundation’s a little different, too. Go ahead and rephrase it.
Q. BY MR. SANGER: All right. Let’s do it this way: A couple of questions. Just in general, if children are on the ranch, are guests at the ranch and they’re staying there and there’s not a parent present, would it be the policy of the ranch not to allow those children to go off of the ranch property without supervision?
A. Correct.
MR. AUCHINCLOSS: I’ll object as vague as to 7039

1 “children.”
2 THE COURT: Overruled.
3 You may answer.
4 THE WITNESS: Yes, we would not let them go
5 off the property by themself.
6 Q. BY MR. SANGER: So at this time do you know
7 whether or not there was a parent at the ranch with
8 Gavin, Star -- well, it was “Gavin, Star, et
9 cetera.” So we’ll say with Gavin and Star.
10 A. I don’t know for sure. I don’t believe
11 there was.
12 Q. All right. So that would be a reasonable
13 instruction for security in general, correct?
14 MR. AUCHINCLOSS: Objection. Argumentative;
15 calls for a conclusion.
16 THE COURT: Sustained on argumentative.
17 Q. BY MR. SANGER: It would not be out of the
18 ordinary, then, to not let children such as Gavin
19 and Star leave the ranch without approval or without
20 supervision, correct?
21 A. Correct.
22 Q. And based on your experience, if children or
23 any guests were scheduled to leave as a group, would
24 it be appropriate for security to be alerted so that
25 the people would be there to leave in the vehicle
26 that was assigned to take them? Does that make
27 sense? It was a long question.
28 A. Would it be appropriate to have security 7040

notified --
Q. Yeah.
A. -- if they were going to be leaving?
Q. Yes.
A. It would have been appropriate. It didn't happen very often, but --
Q. So if there was a bus or a limousine that was going to leave and certain kids were going to be on it, that's something that security could well be advised of, correct?
A. Should well be advised of. We weren't always advised.
Q. Weren't always advised. But if you were advised, you'd feel that was appropriate, right?
A. Yes.
Q. Okay. I'm going to put that page back where I found it. Close the book so I don't mix things up, and we'll come back to it in a moment. All right. Now let's work backwards just a little bit here. You were asked about Frank Cascio, correct?
A. Correct.
Q. And was he also known by another name?
A. Frank Tyson.
Q. Frank Tyson. Okay. Frank?
A. Frank.
Q. As far as Frank Cascio, Frank Tyson was concerned, was he there -- you said he stayed over, 7041

as far as you could tell, quite a number of times, right?
A. Right.
Q. And the District Attorney asked you if this was logged in the logs when he might be staying over.
A. Correct.
Q. Did you go back and look at the logs and add up the times?
A. No.
Q. All right. So you're really not answering that question based on reviewing the logs; is that right?
A. I reviewed the logs, but did not write down or memorize how many times he'd been there.
Q. All right. So your general impression was that he stayed overnight quite a number of times, correct?
A. Yes.
Q. And did Frank Cascio have any other family members who you were aware of?
A. Yes.
Q. And did they often stay over?
A. Yes.
Q. Did his father come out and visit from time to time?
A. Yes.
Q. Did his brother and sister visit from time 7042

1 to time?
2 A. Yes.
3 Q. Any other family members you can recall?
4 A. His mother had been there.
5 Q. Okay.
6 A. I think he had two brothers.
7 Q. All right.
8 A. I believe.
9 Q. Very good. So his brothers, his sister, and
10 both of his parents would stay over from time to
11 time; is that correct?
12 A. Yes.
13 Q. All right. Now, were there times during
14 your -- your span there, when Frank Cascio or his
15 family might be there, and then there would be a
16 period of time where he wouldn't be around and he or
17 his family would come back at some later time?
18 A. Meaning that --
19 Q. That was a bad question.
20 A. I'm sorry, I don't understand the question.
21 Q. Fair enough. Just tell me.
22 In other words, you say he was there -- from
23 the time that you were employed to the time that you
24 left the ranch, you said he was there many times,
25 maybe you saw him 75 to 100 times with Michael
26 Jackson, he stayed over many times, right?
27 A. Yes.
28 Q. Was this continuously or were there periods 7043

of time where the Cascios might be visiting, and then months might go by before they'd come back?
A. Yes, that's correct.
Q. And did -- you were yourself gone for periods of time; is that correct?
A. Yes.
Q. You next had somebody named Vinnie. Did you know his last name?
A. No, I don't know it.
Q. You said, well, he spent the night occasionally, I think. Do you know when that was?
A. The actual dates of when? Or --
Q. If you know them.
A. No, I don't know the actual dates of when.
Q. In general, when did you see Vinnie?
A. Generally I saw Vinnie when Frank was there.
Q. And when did you start seeing Vinnie?
A. Probably in 2002, right around there. I don't know the exact time frame.
Q. Maybe late 2002?
A. Could have been, yes.
Q. All right. So you didn't really see him the entire time that you were working there?
A. No.
Q. He was a more recent visitor?
A. Yes.
Q. Same with Marc Schaffel. You said he was not there -- or he did not spend the night very 7044

often. You recall seeing him every once in a while?
A. Every once in a while. Granted I worked two, three days a week, so I wasn't there all during the week.
Q. I understand.
A. But occasionally he was there, yes.
Q. And was he there continuously during a period of time or off and on, or two different distinct periods of time?
A. I remember him being there just off and on, odd times. He would just come out and -- he may stay the night, he may leave that day.
Q. You mentioned Ronald Konitzer and you said you recognized the name, but you couldn't really put a face to that name; is that correct?
A. I don't believe I could, no.
Q. You remember Mr. Konitzer being listed as a guest; is that correct?
A. Yes.
Q. You remember seeing the name anyway --
A. Yes.
Q. -- in the context of being a guest.
Do you remember Mr. Konitzer's wife and children being listed as guests?
A. I don't remember that, no.
Q. All right. Now, if they were guests, there's a good chance they would be in the guest logs; is that correct? 7045

A. That's correct.
Q. And then you mentioned Dieter Weizner. You said you saw him visiting several times; is that correct?
A. That's correct.
Q. And do you know when this period of time was? Was this the entire time from 1998?
A. No, it would have been later into when I worked there, probably around, again, late -- mid, late '02, end of 2002, into 2003.
Q. Into 2003. Okay. Now, in general, besides intruders, which we talked about, actual trespassers and people who intrude, were there other concerns for security on the ranch?
A. Meaning --
Q. Well, for instance, was one of the concerns that this was Michael Jackson's home and that his privacy should be preserved?
A. Yes.
Q. So there were confidentiality agreements that new visitors would sign when they came to the gate; is that correct?
A. Correct. Correct. I'm sorry, yes.
Q. I didn't know if the court reporter got it.
A. I'm sorry.
Q. And one of the reasons for the confidentiality agreements was -- or one of the provisions was that people not take pictures when 7046

they're at the ranch; is that correct?
A. That's correct.
Q. And you understood the reason for that to be that people would sell pictures if they could; is that right?
A. I understood the reason to be we were told not to let them do it. What they did with them is --
Q. You understand that -- there was a concern about people getting cameras on the ranch to take pictures to sell them to the tabloids?
A. I'm sure that there was.
Q. And some of the intruders that you caught had cameras with them; is that correct?
A. Yes.
Q. Did you -- were you aware of an armed intruder getting onto the ranch?
A. Armed with what?
Q. With a gun.
A. No.
Q. The ranch itself you understood to be Mr. Jackson's home, right?
A. Yes.
Q. And one of the things that security was instructed to do was to accord Mr. Jackson respect as a person who is trying to live in his home, correct?
A. Absolutely. 7047

Q. So the idea was to not unduly approach him or burden him, or take up his time while he's trying to -- while he's trying to be at home, correct?
A. That's correct.
Q. And have you ever worked for any other celebrities or people of that sort?
A. No.
Q. But that made sense to you, didn't it?
A. Absolutely.
Q. All right. When you say that when Mr. Jackson was there people were on pins and needles, did you mean by that to suggest that Mr. Jackson was a harsh or mean boss of some sort?
A. No.
Q. Just -- the structure of the people there, through the various commands and different departments, made everybody aware that when Mr. Jackson's on property that you need to be on your best behavior, right?
A. Yes.
Q. And you didn't see anything wrong with that, did you?
A. No. Not necessarily, no.
Q. Okay. And you felt personally that -- I suppose you probably felt you should be on your best behavior at all times; is that right?
A. Yes.
Q. But you didn't have any objection to 7048

everybody being, you know, particularly careful to be prepared and ready to perform their duties when the owner is on the property, right?
A. I had no objection to that. No.
Q. Now, you said people worked harder when Mr. Jackson was there, right?
A. They worked more, for sure.
Q. Okay. Now, there's sometimes Mr. Jackson was not there when there were big events that were scheduled; is that right?
A. That's correct.
Q. There were family days?
A. Yes.
Q. And you've gone to family days, have you not?
A. Several of them.
Q. Do you have family? I won't go into details. But did you bring family members with you?
A. Yes.
Q. And this is something that Mr. Jackson did for his employees; is that right?
A. That's right.
Q. Basically opened up the whole property, the employees could bring their children, their friends or their close friends or relatives certainly, and could enjoy the rides and all the other amenities at Neverland; is that right?
A. That's right. 7049

Q. Mr. Jackson would sometimes be there and sometimes not; is that right?
A. That's right.
Q. And then there were other days when he would have large groups of either, for instance, disadvantaged children or children who were sick or just children in general who would come to be his guest at the ranch; is that correct?
A. That's correct.
Q. During those times, Mr. Jackson was often not on the property; is that right?
A. Often not on the property?
Q. Yes.
A. That's right.
Q. And he was sometimes on the property; is that correct?
A. Yes.
Q. Whether he was on the property or not, the entire staff was instructed to treat all of the people, adults and children, as guests, as if they were guests at somebody's private home; is that correct?
A. That's correct.
Q. The only difference is that there would be certain boundaries, you can't go into certain parts of the house and that sort of thing; is that correct?
A. That's correct. 7050

Q. But other than that, if the kids want something, if the adults want something, everybody is there to serve; is that right?
A. That's right.
Q. Now, you mentioned that the security guards often did the job of other -- let me withdraw that. You mentioned the security guards worked with the fire department from time to time; is that correct?
A. Basically they were the same department.
Q. All right. And you had at least one fire truck there?
A. Yes.
Q. Was there a time when you had more than one?
A. Well, there was a time when there was -- when I was there, there was a time that there was more than one, one was not working.
Q. Okay.
A. But there were two. And then prior to me being there, yes, there was, I believe, more than one.
Q. Eventually they turned one of those fire trucks into a water truck, I think.
A. Water tender, yes.
Q. There you go. But they have one operating professional fire truck there; is that correct?
A. Not in the sense -- fire rescue, like a brush truck. It would be not like a large city fire truck. But, yes, a working -- held water, medical 7051

equipment.
Q. All right. Not a hook and ladder, but
something that was an emergency vehicle --
A. Yes.
Q. -- that could be used to tend to emergencies
on this ranch, correct?
A. Correct.
Q. And anywhere from somebody being injured,
to having a brush fire, to anything else that was
needed on an emergency basis; is that right?
A. Yes.
Q. And both the people who were assigned as
security officers and those assigned as firemen were
somewhat interchangeable in these tasks. If it
needed to be done, you all would respond and do it;
is that correct?
A. That is correct.
Q. Now, there were a number of people who were
in the fire department from time to time who
eventually became employed in other fire
departments; is that correct?
A. Yes.
Q. All right. So this was an area where people
could work, gain additional experience in order to
go work someplace else; is that right?
A. Yes.
Q. And did you feel -- as a professional law
enforcement officer, did you feel that the -- that 7052

1 the operation was run professionally?
2 A. Yes.
3 Q. All right. Now, the duties of security and
4 fire you said were pretty much merged. But in
5 addition to those duties, you also had duties to
6 attend to the needs of guests and Mr. Jackson, or
7 anybody else who required some assistance on the
8 ranch; is that correct?
9 A. Yes.
10 Q. And they were not always law enforcement
11 duties or fire duties, correct?
12 A. Generally, no.
13 Q. Generally not.
14 So, if somebody needed something, you or
15 anybody else that worked there -- say a guest needed
16 something, you or anybody else that worked there was
17 expected to respond as favorably as possible; is
18 that right?
19 A. Yes.
20 Q. All right.
21 THE COURT: Counsel? Take our break.
22 MR. SANGER: Okay. Thank you.
23 (Recess taken.)
24 --o0o--
25
26
27
28 7053

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 6992 through 7053 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 20, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 20, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

WEDNESDAY, APRIL 20, 2005

8:30 A.M.

(PAGES 7055 THROUGH 7115)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 7055

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Mesereau is listed as “M” on index. Ms. Yu is listed as “Y” on index.
Mr. Sanger is listed as “SA” on index. Mr. Oxman is listed as “O” on index.

PLAINTIFF’S WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
BARRON, Brian 7058-SA (Continuing)				

THE COURT: Go ahead.
MR. SANGER: Thank you.
Q. All right. Mr. Barron --
A. Uh-huh.
Q. -- or Officer Barron, across the street from --
THE BAILIFF: Can you turn your microphone on?
MR. SANGER: Oh, sorry. There you go.
Q. Across the street from Neverland on Figueroa Mountain Road, there are two schools; is that correct?
A. That's correct.
Q. What kind of schools are they?
A. One is a boarding school, and one is like a -- an elementary school, I believe.
Q. Okay. And are these private schools?
A. Yes.
Q. People are there during the day?
A. Yes.
Q. So there's activity, at least during the school year; is that correct?
A. Correct.
Q. All right. February and March of 2003, those schools would have been open; people would have been there?
A. Yes.
Q. Parents coming and going? 7058

A. Yes.
Q. Teachers?
A. Yes.
Q. Administrators?
A. Yes.
Q. Now, you told us about the security staff that you were a member of, correct?
A. Correct.
Q. And you told us about the fire department?
A. Correct.
Q. Did Mr. Jackson also have personal security or personal bodyguards?
A. Yes.
Q. And are these people who traveled with him?
A. Yes.
Q. You did not travel with Mr. Jackson; is that correct?
A. No.
Q. So your duties were pretty much restricted to the ranch. I shouldn't say restricted. It's a big ranch, but you were there at the ranch, correct?
A. Yes.
Q. If he went to Los Angeles or Miami or went on tour or anything else, you would not go with him; is that correct?
A. No.
Q. And who would go with him?
A. Whomever was his personal security at the 7059

time. It did change.
Q. All right. So he did have people who were generally experienced in going on the road and protecting a celebrity under those circumstances; is that correct?
A. There were times when he did, yes.
Q. Okay. There were some times when you thought his personal security may not have been --
A. Yes.
Q. -- quite as -- okay. All right.
Now, do you remember Janet Arvizo?
A. I know she was there. I do not remember her face until yesterday.
Q. All right. But you remember her being there and you remember having some contact with her; is that correct?
A. Yes.
Q. And you remember Gavin Arvizo?
A. Yes.
Q. You remember Star Arvizo?
A. Yes.
Q. And in general, did Janet Arvizo ever appear to not want to be at the ranch?
A. In general, I couldn't answer.
MR. AUCHINCLOSS: Objection. I'm going to object on the basis of foundation.
THE COURT: Sustained.
Q. BY MR. SANGER: All right. Would it be your 7060

opinion, based on your seeing her there at the ranch, that what stood out in your mind was that Mrs. Arvizo appeared that she wanted to be there?
MR. AUCHINCLOSS: Objection. Same objection.
THE COURT: Sustained.
Q. BY MR. SANGER: All right. What kind of contact did you have with Janet Arvizo?
A. Probably talked to her on the phone once or twice. Other than that, relatively none.
Q. When you talked to her on the phone, did it appear that she wanted to be there at the ranch?
A. Yes.
Q. And Janet Arvizo had access to the house, full access to the house; is that correct?
MR. AUCHINCLOSS: Objection. Foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: I don't know.
Q. BY MR. SANGER: Okay. Do you recall testifying before the Santa Barbara Grand Jury on April the 12th, 2004?
A. Yes.
Q. Do you recall telling the grand jury that Janet Arvizo was one of the people who had access; she would have access to the house?
A. Yes.
Q. And when you were -- when the District 7061

Attorney said, “Okay,” you said, “No question.”
A. Yes.
Q. Is that correct? And she had full access to the house because her children were there; is that correct?
A. Yes.
Q. All right. Now, did you have any personal observations about the behavior of Gavin and Star?
A. No.
Q. They appeared -- from what you could see, they appeared to want to be at the ranch; is that correct?
MR. AUCHINCLOSS: Objection. Foundation.
THE COURT: Sustained.
Q. BY MR. SANGER: Did you see them from time to time at the ranch?
A. Seldom.
Q. Was there any indication -- from the seldom times that you saw them, was there any indication that they did not want to be at the ranch?
A. No.
Q. You indicated that part of the security -- part of security’s job was to monitor who was coming onto the property, correct?
A. Correct.
Q. And that was recorded, to a large extent, in the gate logs; is that correct?
A. Yes. 7062

Q. Were you aware that in addition to just plain interlopers, that there would be people who would try to gain some kind of introduction to Mr. Jackson to get into his favor?
MR. AUCHINCLOSS: Objection. Ambiguous; foundation.
THE COURT: Overruled.
You may answer.
THE WITNESS: How do you mean?
Q. BY MR. SANGER: Well, were there people who seemed to be trying to get close to Mr. Jackson?
A. Yes.
Q. And sometimes Mr. Jackson really wouldn't want those people to be around him, correct?
A. Correct.
Q. So if they were allowed on the ranch, they were to be treated courteously?
A. Yes, yes.
Q. But nevertheless, you were to try to help Mr. Jackson not be bothered by people; is that right?
A. That's right.
Q. And Mr. Jackson, of course, during the time you were there, and now, for that matter, is an international celebrity, an artist, a very well-known person, correct?
A. Yes.
Q. And there would be people who would 7063

basically be trying to get into his good graces; is that right?
MR. AUCHINCLOSS: Objection. Foundation.
THE COURT: It's argumentative. Sustained.
Q. BY MR. SANGER: All right. Now, let me ask you one other thing before we get to the gate logs and some of the other documents you identified. You were actually asked -- let me put it a different way. You were contacted by the Santa Barbara County Sheriff's Office in December of 2003; is that correct?
A. That's correct.
Q. And in particular, Detective Bonner of the Santa Barbara Sheriff's Department contacted you; is that correct?
A. Correct.
Q. And he did an interview of you to determine if you'd seen anything unlawful and so on; is that correct?
A. That's correct.
Q. But then he asked that you work as an informant; is that correct?
A. Yes.
Q. And you were at that time a sworn peace officer of the Guadalupe Police Department, correct?
A. That's correct.
Q. And he basically wanted you to go back to work for Mr. Jackson in December of 2003 to be an 7064

informant, correct?
A. That's correct.
Q. And at that time, you know that the raid had already occurred on Mr. Jackson's house, correct?
A. Correct.
Q. You knew Mr. Jackson had a lawyer, had counsel, right?
A. Yes.
Q. And you were being asked to go in as a law enforcement informant into his ranch, at his home, and inform for the sheriff; is that correct?
MR. AUCHINCLOSS: Objection. Asked and answered.
THE COURT: Overruled.
You may answer.
THE WITNESS: Yes.
Q. BY MR. SANGER: And you refused to do that; is that right?
A. Yes.
Q. What I'd like to do now is go through some of the exhibits that you've identified and ask you, based on your training and experience, to interpret the documents, okay?
To the extent you were there, you made an entry, and then you can contribute that as well and say, "Yes, I actually wrote that."
A. Yes.
Q. But to the extent that you introduced these 7065

documents, you said they were kept in the ordinary course of business, I'd like you to explain what they mean, if you could.
A. Okay.
MR. SANGER: So I'm going to start with Exhibit 300, and, Your Honor, if this procedure is acceptable, I'd like to do this without asking each time -- or I can. Whatever the Court wants me to do.
What I propose to do is identify the document by exhibit number. If there is more than one page to the exhibit, I'll indicate which page of the exhibit. If -- in the Exhibits 334 and 335, there are hundreds of pages, so I'll refer to the Bates stamp number on the bottom of the page for that purpose.
And if that procedure is acceptable, what I'd like to do then is put each of these up on the -- not all of them, but each of the ones I want to point out on the overhead projector, and I'll just make reference to it at the time.
THE COURT: That's a fine procedure.
MR. SANGER: Okay. Thank you. In other words, I won't ask leave each time. I'll just do it.
THE COURT: That's good.
MR. SANGER: Thank you. Okay. In that case, with the Court's permission in advance, I'll 7066

put Exhibit 300 up.
THE BAILIFF: Can you put “Input 4”?
MR. SANGER: Or we’ll put up Mr.
Auchincloss’s....
THE COURT: That was “Input 4.”
Q. BY MR. SANGER: What I’m going to do, I
hope, is put it up in a way so we can show the
exhibit tag number, if such exists, and then I’ll
give you an opportunity here to see what the
document is, best we can.
If you want me to -- this was printed pretty
large, so we can do it this way, if you want me to
scroll it up or down. If you’d like me to approach
and give it to you, if you can’t read it, I’ll just
walk up and show it to you. So just let me know.
A. Okay.
Q. This is Exhibit 300. And it appears at the
top to be an accident damage report, okay?
A. Okay.
Q. And I think you told us that was kept in the
ordinary course of business; is that correct?
A. Correct.
Q. And the accident damage report appears to
have been generated on a computer; is that right?
A. Correct.
Q. In other words, it’s not just a form that’s
handwritten in, but somebody generated the whole
thing on a computer, correct? 7067

A. Yes.
Q. And the format is such that it appears to be a standard format, and then you put in particular information based on the particular incident; is that correct?
A. That's correct.
Q. All right. Now, what would be the purpose of this particular accident damage report? Let me rephrase that. What does this accident damage report refer to?
A. One of the golf carts.
Q. All right. And from that report and from the records, and based on your training and experience, can you explain what happened and why this report was written?
A. I can read it.
Q. Okay. Well, let's do it this way, because we'll start this way and then the other ones will speak for themselves.
There's a date up there at the very top, right?
A. Yes.
Q. 6-21-02.
A. Yes.
Q. Would that be the date of the incident?
A. Yes.
Q. And then you have a date at the bottom. Would that be the date the report was written? 7068

A. Yes.
Q. And there's a time, 1610, so 4:10 in the afternoon, correct?
A. Correct.
Q. And the time at the top would be 1530, which would be 3:30 in the afternoon, correct?
A. Correct.
Q. All right. So this report is designed to document the fact that Gavin Arvizo was involved in crashing a golf cart into the theater fountain; is that correct?
A. That's correct.
Q. And the cause of the accident was recorded as reckless driving; is that correct?
A. That's correct.
Q. All right. Now, you told us that you're supposed to be very courteous to the guests, no matter who they are, where they're from or whatever. Is it appropriate, however, for security officers to warn guests, particularly children, if they're involved in unsafe behavior?
A. Yes.
Q. And based on this report, does it appear that there was a warning given to Gavin Arvizo about driving the golf cart?
A. Yes.
Q. And the warning was to slow down or the golf cart would be taken away; is that correct? 7069

A. Correct.
Q. So based on your experience in these records, that would indicate that an officer gave that warning to Gavin Arvizo?
A. Yes.
Q. All right. Were you aware of other incidents involving Gavin or Star Arvizo that involves destruction of property or accidents or that sort of thing?
A. No.
Q. Okay. Did you review these records to see if you could find such evidence?
A. Not for that purpose, no.
Q. Okay. That's fair enough. Actually, I didn't see that. I don't think it was on my copy. Maybe it was.
On the back of 300 is a photograph. Does that appear to be a Polaroid-type photograph?
A. Yes.
Q. Is that the front of a golf cart?
A. Yes.
Q. And it kind of looks like a car.
A. Well, you couldn't hold golf clubs on them. They're more of a car.
Q. It's essentially the frame of a golf cart and it's got a little fiberglass car body on it?
A. Correct.
Q. And this one, I think, is the Batmobile one; 7070

1 is that --
2 A. We call it “the Batman cart.”
3 Q. “The Batman cart,” okay. In any event, this
4 photograph is taken to show damage that was
5 associated with that report; is that correct?
6 A. That’s correct.
7 Q. I’m going to go to Exhibit 301.
8 And just so nobody gets too nervous, Your
9 Honor, I’m going to try to -- I’m going to keep
10 these in order, but it’s too hard to put them back
11 on the sprocket there, and I’ll do that when we’re
12 through, if that’s all right.
13 THE COURT: Yes.
14 MR. SANGER: 301 consists of a number of
15 pages. And in the book, I would say it’s page four.
16 It’s the back of the second sleeved page. No, I’m
17 sorry, it’s the back of the first sleeved page, so
18 it would be page two, I suppose. And let me put
19 this up, if I may.
20 Do you want to see it first?
21 MR. AUCHINCLOSS: Uh-huh.
22 Q. BY MR. SANGER: All right. Exhibit 301 is
23 the front, and then the back of the sleeve is the
24 next page. And we’ll use this document for the
25 purpose of orienting everybody to the way this
26 works.
27 At that time, there was a form that looked
28 like this, correct? 7071

A. Correct.
Q. And that form was changed slightly as time went on; is that correct?
A. Yes.
Q. But essentially you've got -- at the top, you have the blanket "Routine Authorized Entries." That's people who might be making deliveries, that sort of thing; is that correct?
A. That's correct.
Q. I see up there, for instance, "Santa Barbara Surfacing." Looks like somebody may have been there to do some surfacing work on the roads; is that correct?
A. I don't know what they were doing, but, yes.
Q. Okay. Just as an example, all right. And then I see -- looks like it says "Santa Ynez Ford." It is a little hard to see.
A. "Santa Ynez Feed."
Q. That would make more sense. "Santa Ynez Feed." That would be, for instance, you would assume somebody came on at 11:30 to deliver some feed, and by 11:57, or whatever that says, they went back out the gate, correct?
A. Correct.
Q. And the in-and-out times on this are recorded at the time somebody comes in the gate, right?
A. Yes. 7072

Q. And the time they leave, right?
A. Yes.
Q. So when somebody comes in the gate, the gates are opened if they're allowed to have access?
A. Right.
Q. They stop the car or the truck right there by the guard house, correct?
A. Right.
Q. And the guard comes up and greets them?
A. Yes.
Q. And will write down who the person is and write down the exact time that it is at that moment; is that correct?
A. Yes.
Q. And when they leave, the same thing occurs in reverse. They're stopped before the gate. The guard will record who's in the vehicle and the time that they're leaving; is that correct?
A. Well, yes. We would make sure it's the same person, and then we wouldn't record their name again, but we would just record their time out.
Q. Their time out, okay.
So if somebody came in with three people and only left with one, you'd want to know about that?
A. Yes.
Q. All right. Now, we have the guest names down there. And guests would be people who are guests of the owner staying at the ranch, correct? 7073

A. Correct.
Q. And they might be guests who stay all day and they might be guests that are coming and going that same day; is that correct?
A. That's correct.
Q. All right. Now, I don't know if it's the glare or what. It's a little hard to read. Can you read it from there?
A. For the most part.
Q. Okay. Right at the top of "Guests," it says, "Grace"; is that correct?
A. Yes.
Q. And it says, "C/O." And that means?
A. Carried over. They were carried over from the previous 24-hour period.
Q. So, in other words, there's no entry time for Grace, because Grace was already there?
A. Already there at midnight the night before. This was prepared at midnight the night before.
Q. And there's no indication that Grace left, so one would assume that she would still be there the next day?
A. At midnight of this day, this would be completed, and that "CO," carry-over, would be put in the "out" box. So she would continue to be carried over for the period.
Q. So let's look down the list. And the third person on the list appears to have gotten there at 7074

1205; is that correct?
A. Correct.
Q. And that would be five minutes after noon;
is that correct?
A. Correct.
Q. And then left at 1440 hours, which would be
2:40 in the afternoon; is that correct?
A. Yes.
Q. Can you tell me who that person is?
A. I can't read that.
MR. SANGER: All right. May I approach with
a copy?
THE COURT: Yes.
Q. BY MR. SANGER: Now that you have it in
front of you, can you read the name?
A. Yes.
Q. What does it say?
A. "M. Bashir."
Q. So Mr. Bashir came there at five minutes
after noon and left at about 2:40, or left at
exactly 2:40, correct?
A. Yes.
Q. Let me leave that with you just for the
moment, just in case you have trouble reading the
rest of it.
A. Uh-huh.
Q. On that same day, it appears Chris Tucker
arrived; is that correct? 7075

A. Yes.
Q. And Chris Tucker arrived at?
A. 1500, or 3 p.m.
Q. So 3 p.m. And it appears that at the same time Chris Tucker arrived, a number of other people came through the gate; is that correct?
A. Yes.
Q. And those people include Gavin Arvizo?
A. Yes.
Q. Star Arvizo?
A. Yes.
Q. There are a couple of other people there, and then I think there are three other people, and then there's something that says, "Gavellin." Or what do you think it says?
A. Well, it looks like maybe "Aubrey."
Q. Below that. Right below that.
A. "Gavel" -- yeah, "Gavellin." I -- "Gavellin."
Q. "Gavellin." Do people always get the spelling right at the gate?
A. Not always, no.
Q. Okay. You try your best, but sometimes you just spell it the way you thought you heard it?
A. The way it sounds, yeah.
Q. All right. So those people, plus Adrian, Kelly Bond and Aubrey, or Audrey, whatever that says, all those people seem to have come at three 7076

1 o’clock on the dot, correct?
2 A. Yes.
3 Q. All right. Now, it appears that Mr. Tucker
4 and the Arvizos did not leave -- and I’ll ask you to
5 assume, just for the sake of this question, that
6 “Gavellin” is an Arvizo. But those three people
7 came at three o’clock and they did not leave that
8 day; is that right?
9 A. Correct.
10 Q. All right. Let me retrieve my book, if I
11 may. Thank you. I guess I was asking permission of
12 the Court to approach there, to be specific.
13 I’m now going to go to Exhibit 302, and this
14 would be what appears to be the third page of 302 in
15 the exhibit, the official exhibit book. So this
16 does not have a tag on it, but the first page does.
17 And I’m sure I would be corrected if I were wrong.
18 This is 302 I’m putting up, the third page.
19 So let’s start up here, first of all. This
20 is on 6-22, the date following the day that we just
21 saw; is that correct?
22 A. Yes.
23 Q. And we look down here, and we see that it
24 appears that Chris Tucker, Gavin, Star, and the
25 other people we talked about, and then this
26 “Gavellin,” all show that they are carried over; is
27 that correct?
28 A. Correct. 7077

Q. And they're carried over not only from the day before, but they appear to be carried over to the next day.
A. Correct.
Q. And if we look at 303 -- and we'll take page two of 303. It's on the back of the envelope here. So that's 303, and I'll turn it over, and that's the guest names. And once again, Chris Tucker, Gavin, Star, and "Gavellin" are all carried over as guests; is that correct?
A. Correct.
Q. And I'm sorry, that's the next day, 6-23; is that correct?
A. Yes.
Q. We go to 304, Exhibit 304. Looking at page two of 304, page two, 6-24-02?
A. Yes.
Q. And again, we show Chris Tucker, Gavin, Star and "Gavellin" all carried over; is that correct?
A. Yes.
Q. And it doesn't show any check-out time for them or any time they went by the gate; is that correct?
A. No. That's correct.
Q. And then 305, this would be the third page, 6-25-02. And it shows Chris Tucker, Gavin, Star. And I don't see "Gavellin" on there or "Davellin" or anything else like that. But it shows that Chris 7078

Tucker's group left at 7:54 in the morning; is that correct?
A. Correct.
Q. So they would have been there overnight and then they left together?
A. Correct.
Q. Okay. Now, if we skip ahead timewise to -- it's Exhibit 306, and it's page two of 306, it says "6-29-02" on the top, and it appears that Gavin, Star, and Davellin, or Davellin, and a limo driver all showed up at 46 minutes after midnight; is that correct?
A. Correct.
Q. And Gavin, Star and Davellin all stayed there overnight that day, correct?
A. Correct.
Q. And the limo driver got a cup of coffee and left, looks like.
A. Yes.
Q. Okay. And then going to Exhibit 307, about 6-30-02, we have Gavin, Star and Davellin all staying overnight at the ranch, correct?
A. Correct.
MR. SANGER: All right. Excuse me just one second.
(Off-the-record discussion held at counsel table.)
MR. SANGER: Excuse me, Your Honor. I'm 7079

sorry. I just had to clear something up.
Q. Okay. I want to -- just because it's in sequence in the exhibits, let me show you 308, and this is a different kind of a form. And we'll be able to go a lot quicker here. And actually, we'll skip quite a ways ahead in a moment, just so everybody has something to anticipate.
308, okay, and I'll try to get as much of a wide angle as I can and still read it. Do you see that? It says, "Security Clearance and General Information"?
A. Yes. "Guest Information."
Q. Or, I'm sorry, I can't read it. All right. I can read it here. "Guest Information." And this is information about the people who were arriving. And actually, this dates back a little out of sequence. It dates back to 6-21-02, correct?
A. Correct.
Q. And basically this is information so you know how to treat the guests and what they can do; is that right?
A. We know who's coming and what they're able to do.
Q. Okay. So this tells you the estimated time of arrival; is that correct?
A. Correct.
Q. And you never know exactly if somebody's 7080

going to arrive on time, but it gives you a heads-up, right?
A. Right.
Q. And it shows Chris Tucker, Gavin Arvizo, Star Arvizo, Adrian, Kelly, Gavellin and Aubrey, it looks like.
So on 6-21, this was telling you these people are really going to show up, right?
A. Yes.
Q. And then at the bottom, it says Mr. Jackson has cleared the guests to have full access, correct?
A. Correct.
Q. So Chris Tucker and his guests are allowed to have full access to all of these activities; is that right?
A. That's right.
Q. And those activities include the hill house, pool, spa, water fort, dance studio, and then quad runners; is that right?
A. Yes.
Q. And what were the quad runners?
A. ATVs.
Q. Were people supposed to keep those on the property?
A. They were property of the ranch.
Q. But, I mean, they weren't supposed to go drive on Figueroa Mountain Road.
A. Correct. 7081

Q. And they definitely were not supposed to go into Los Olivos.
A. No.
Q. All right. And then there's scooters, right?
A. Uh-huh.
Q. Golf carts?
A. Yes.
Q. Jet skis. The main house. And written in is "horseback riding"?
A. Yes.
Q. So Mr. Jackson, according to this record, kept in the ordinary course of business, had cleared the guests to have full access to all of those activities?
A. Yes.
Q. And those guests would be Mr. Tucker and the Arvizos and his other guests; is that correct?
A. I believe Mr. Tucker, there, says he was the driver. Whether or not he had access to that stuff at the same time, probably, but --
Q. Do you know who Chris Tucker is?
A. Yes.
Q. Okay. Who is Chris Tucker?
A. He was an employee of the ranch.
Q. Okay. Are you thinking --
A. Or of Mr. Jackson.
Q. Are you thinking of Chris Carter? 7082

A. I'm sorry. Chris Tucker. Excuse me. I apologize.
Q. Chris Tucker is the actor?
A. Chris Tucker is the actor, yes. I'm sorry.
Q. Do you remember him visiting the ranch?
A. Yes.
Q. And you would assume Chris Tucker would have --
A. Chris Tucker, I'm sorry. Thank you.
Q. He would have full access to --
A. Yes, he would.
Q. All right. Now, if we go to Exhibit 309, you may recall -- let's show 309. There we go. You may recall that when we went through the gate logs, it appeared that Gavin, Star and Davellin came back and Mr. Tucker was not there; is that correct?
A. Correct.
Q. Now, when they came back this time, they're estimated to arrive sometime in the evening. And if I'm not mistaken, I think they got there very early in the morning the next day. But here, Mr. Tucker is not there. They were not cleared for the quad runner or the jet skis; is that correct?
A. Yes.
Q. And they were not cleared for horseback riding; is that correct?
A. Correct. 7083

Q. Based on your experience and understanding of these records kept in the ordinary course of business, who would have given those instructions?
A. Those instructions there?
Q. Yes.
A. They would -- this would have come to us through the administration office.
Q. All right. So somebody in the chain of command above decided that, under these circumstances, that these children should not have access to the quads or the jet ski?
A. Correct.
Q. All right. We'll go to Exhibit 310. And this will be the second page of 310. And it appears that -- 7-1-02. And it appears that Gavin, Star and Davellin stayed overnight, correct?
A. Correct.
Q. And then they left at 2114 hours, which would be 9:14 in the evening, correct?
A. Correct.
Q. Now, then we skip ahead in time to September the 15th, which is the next record in the exhibit book which was presented to you by Mr. Auchincloss. And that shows 9-15-02; is that correct?
A. That's correct.
Q. And on 9-15-02, we have Chris Tucker, Gavin, Star, sister, it looks like it says Chris's nephew; is that correct? 7084

A. Correct.
Q. There's a star there. What does that mean?
A. Probably means that the time was either not written down when they came in, or it was -- at that time, whomever was checking people in the gate failed to write them in, or we just didn't know when they came in.
Q. Okay. So every once in a while somebody makes a mistake, true?
A. Yes.
Q. That will happen.
And then it shows on that day, which is 9-15-02, Mr. Tucker and his group, including Gavin, Star, sister, and Chris's nephew, all stayed overnight; is that correct?
A. Correct.
Q. I'm going to go to Exhibit 312. 9-16-02.
And here we have a record that Chris Tucker and his group stayed overnight. It also shows "bus driver," correct?
A. Yes.
Q. Do you remember if Chris Tucker had a bus?
A. I don't know if he personally had a bus. I don't remember.
Q. Well, looks like the bus driver left with Chris Tucker and the rest of the party at 6:54 in the morning; is that correct?
A. Yes. 7085

Q. Now, do you know if Mr. Jackson was at the ranch at these various times that we've covered so far?
A. I don't know.
Q. Okay. Now, 9-26 -- I'm sorry, this would be Exhibit 313, the second page. 9-26 at the top, '02. And I think you can read this, but if you can't, just tell me.
I don't know if I made it better or worse.
Okay. All right. Looks like Martin Bashir arrived at two o'clock in the afternoon and left at 6:13; is that correct?
A. Yes.
Q. And it looks like he probably arrived with some other people there. There's three other people, correct?
A. Correct.
Q. We see -- we see Gary Hearn arrived at 2:30; is that correct?
A. Yes.
Q. All right. Looks like somebody adjusted that, but that was the way it was entered at the time; is that correct?
A. Correct.
Q. All right. And it looks like -- now, first of all, Gary Hearn is who?
A. Gary's a driver.
Q. He's a driver for Michael Jackson and for 7086

Neverland; is that correct?
A. Yes.
Q. He often drives a limousine or whatever car is appropriate to transport people, correct?
A. Correct.
Q. And Gary Hearn seems to have arrived with Gavin, Star, and “Davida” or “Davila” or something, whatever that says, right?
A. Yes.
Q. All at the same time. And then it appears that they were there from 2:30 and stayed overnight; is that right?
A. Correct.
Q. And then I’m going to put up 314, the second page. And it shows Gavin, Star, and “Davida” - I think that’s what it says - stayed over that night as well, correct?
A. Correct.
Q. And then I’m going to put up 315, page two, for 9-28, okay? I’m going to go down to the bottom, and it looks like Gavin, Star, and “Davida,” or whatever that says - all right? - stayed overnight, but they left at four o’clock in the afternoon; is that correct?
A. That’s correct.
Q. And it appears that Gary -- down at the bottom, that’s probably “Gary Hearn”; is that correct? 7087

A. Most likely, yes.
Q. And Gary Hearn came and went, but he came in about three o'clock, and then left at exactly four o'clock; is that correct?
A. Yes.
Q. So based on that, you would assume that he drove the -- Gavin, Star, and whoever Davida is; is that correct?
A. Yes.
Q. And it looks like it -- it's really hard to see what that says there, but it does look like there's an entry, and I just want to clarify it so I don't get confused. It says something like "Maxim Bahit"?
A. Your guess is as good as mine.
Q. All right. It's not "Martin Bashir,"
though?
A. It doesn't look like "Martin Bashir" to me.
Q. All right. Now, if somebody checks out -- in other words, I say "checks out." If somebody goes through the gate, out, and then they go to dinner or to town or whatever, and they come back, when they come back, they should be logged back in again with the time?
A. Yes.
Q. Does that sometimes not happen?
A. For employees? Sometimes.
Q. For anybody. 7088

A. Yeah, I'm sure there's times when it happens.
Q. All right. Now, I'm going to skip way ahead, and you guys are going to be happy to hear that, to Exhibit 331.
Okay. I'm sorry. Better yet, 333. And I'm going to put 333 up. This is the second page of it. And there's a -- wide angle here. Okay. A medical report log; is that correct?
A. Correct.
Q. And that logs in various medical emergencies or skinned knees or anything else that happens that requires somebody to respond?
A. Each medical report for the year.
Q. And on the other side, actually the front side of 333, there's a medical report for Star Arvizo; is that correct?
A. Yes.
Q. Can you read that?
A. Not well. Actually, that really hurts my eyes. If you could bring it up, that would be great.
Q. Actually, I don't blame you.
May I approach, Your Honor?
THE COURT: Yes.
Q. BY MR. SANGER: I'm giving you a copy of that page. Can you take a quick look at it there? And what I want to ask you is, basically, 7089

1 does this document reflect that Star Arvizo
2 apparently had a fall on a scooter, slid on some
3 loose gravel or something?
4 A. Yes.
5 Q. And he had minor scrapes to his left knee,
6 right ankle and right knee?
7 A. Yes.
8 Q. So that sort of thing was documented
9 carefully at Neverland, and that's an example of it;
10 is that right?
11 A. Yes.
12 MR. SANGER: All right. May I approach to
13 retrieve that, Your Honor?
14 THE COURT: Yes.
15 Q. BY MR. SANGER: All right. I'm now going to
16 go to Exhibit 334. For the benefit of the Court and
17 everybody else, it's probably about 90 pages, and so
18 this is a part where I'm going to refer to -- I'll
19 just put the first page up so we can see it here,
20 334, and it's again one of the logs, which I believe
21 here actually starts February 1 of '03, correct?
22 A. Yes.
23 Q. All right. And now I'm going to refer to a
24 Bates stamp number, which is a number in the lower
25 part of the document, generally the lower right
26 corner, and I believe in all of these it starts out
27 with "MJ" and two zeroes and then a number. And I
28 will refer to that so we're on the same page. 7090

THE COURT: Okay.
Q. BY MR. SANGER: And I'm going to skip to page 116. That's MJ00116. And I'm going to show you this here.
Now, this appears to be the format that was being used in 2003; is that correct?
A. Correct.
Q. And I think it's a little different, at least a little different than some of the forms that were used because under "Guest Information" you also have "Ranch Vehicle Information" --
A. Yes.
Q. -- showing when people come in and out.
On this particular document -- oops, sorry.
Let's try here. This is for February the 6th, 2003; is that correct?
A. Correct.
Q. And it appears that at 2243 hours -- let's see. 2245 hours, it should be 10:45 at night, it says, "Owner and guests"; is that correct?
A. Yeah. Could I see that page? I -- I would assume it does.
MR. AUCHINCLOSS: May I see that?
MR. SANGER: May I approach?
THE COURT: Yes.
THE WITNESS: Based on the paperwork that we fill out, we would not have put "owner" or "Mr. Jackson" or anything that would represent him 7091

on this paperwork. In the time that I worked there, I have never done that, that I can remember. It could be -- it could be, “Owner and guest,” which I didn’t write it, but definitely could be.

Q. BY MR. SANGER: Okay. That’s fair enough. I’ll ask you about that a little more so it makes sense.

MR. AUCHINCLOSS: Could I see that again?

MR. SANGER: Sure.

Q. This is Mr. Jackson’s home, right?

A. Correct.

Q. And so you were not -- not only not required to, but you were really not supposed to write down Mr. Jackson comes and goes and log him in like somebody else; is that right?

A. That is correct.

Q. Okay. You saw what you thought said, “Owner and guest,” may have said, “Owner and guest,” you’re not sure --

A. No.

Q. -- but it would not be typical for you to write down “Owner”?

A. I’ve never done it. The whole time I was there, I’d never done it.

Q. That’s fine. And it does -- it looks like it says, “Guest.”

A. Yes. 7092

Q. All right. It doesn't say who the guests are?
A. No.
Q. And that's somewhat unusual, isn't it?
A. If someone had come in with Mr. Jackson, we don't routinely stop his vehicle and look in his vehicle. Again, it's privacy for him. We try to bother him as little as possible.
So if someone had -- if that is "Owner and guest" and someone had come with him, we would not have just stopped his vehicle and, for the most part, asked who was in there, unless we really felt it was necessary.
MR. SANGER: Do you want to leave that on?
MR. AUCHINCLOSS: Yeah.
MR. SANGER: Okay. All right. I won't put it here. I'll --
MR. AUCHINCLOSS: Yeah, that's fine.
Q. BY MR. SANGER: I want to see if we can reconstruct this a little bit. Where it just says, "Guests," there are no names?
A. Correct.
Q. So does that suggest to you that those guests were probably in a vehicle with Mr. Jackson?
A. It could have -- yes, it could have been.
Q. All right. And now we're going to go to -- and I'm sorry, that was on 2-6, February 6, 2003, correct? I'll put it up again if you want. 7093

A. Yes. That's correct.
Q. All right. February 6th, 2003.
Do you know if Mr. Jackson was returning
from Miami that night?
A. I don't know.
Q. Okay. All right. And you're welcome to
look at this whole exhibit, if you want me to bring
the book down so you can see it, if you feel you
need to look at the pages in order or anything,
okay?
I'm going to put up 2-7-03, which is
MJ00120. And that is still a part of Exhibit 334,
okay? And you can see we're referring to the "120"
down there on the bottom, just so we're all
oriented. That's what we call the Bates stamp
number.
This is for 2-7-03; is that correct?
A. Yes.
Q. All right. Now, if you look at the
guests -- and I'm going to bring it a little closer
and give everybody a headache, all right? If you
look at the "Guests," it appears that there's an
M. Nicole Cascio --
A. Yes.
Q. -- who stayed overnight; is that right?
A. Yes.
Q. And it looks like a Dr. Farshshian stayed
overnight; is that correct? 7094

A. Yes.
Q. Actually, I'm going backwards. He's at the
top of that list, right?
A. Right.
Q. It looks like he left at 8:30 in the
morning, right?
A. Right.
Q. And then he may have come back at 10:15?
A. Yes.
Q. Okay. So let's go down to -- to "Marie
Nicole," or it says, "M," something, Nicole Cascio."
You assume that's Marie Nicole?
A. Yes, uh-huh.
Q. So -- it says stayed over or carried over,
so that would tell you she stayed overnight; is that
right?
A. Yes.
Q. Now that you think about that in conjunction
with the whatever-it-was "and guests," does that
suggest that Marie Nicole Cascio was probably one of
the guests that came in the day before?
A. Do you have the other pages for this?
Q. I have --
A. There's usually like three pages per day.
Q. Yes. Yes. You're welcome to look at them.
We have to be careful because we've got the book
apart, and I want to put it back. So we have to
keep it in the same order here. 7095

Before I do, I'll let you see the whole thing, but it's safe to say you've got Gavin Arvizo, Star Arvizo, looks like "Daviella" now, Arvizo, Aldo Cascio, and Mom Arvizo, right?
A. Correct.
Q. And those are all carry-overs. So that would mean, to you, that they were there --
A. The night before.
Q. -- the night before?
A. Prior to midnight of that day.
Q. Of this day, which was 2-7 --
A. Correct.
Q. -- 03.
Okay. And it also appears that they then continued to stay overnight on the 7th; is that right?
A. Yes.
MR. SANGER: Okay. So now having said that, if it's all right with the Court, I'll approach with the book so that the witness can see everything in context.
Q. And I'll just speak loud for a moment, if I can.
The pages are in the exact order of the exhibit, so keep them in that same order, if you would.
A. Yes.
At some point they came in on the 6th and 7096

were there on the 7th.
Q. All right. And as you look at that --
before I come up and retrieve it, as you look at that, there's no specific record where those particular individuals, that is, the Cascios and the Arvizos, were logged in by name as coming in.
A. No.
Q. Other than perhaps just that reference to "Owner and guest," or whatever it says; is that correct?
A. Correct.
MR. SANGER: All right. May I approach to retrieve the book, Your Honor?
THE COURT: Yes.
MR. SANGER: Okay. Thank you, sir.
Q. Now, I'm going to go to page 121 of the same exhibit. It will still be 334 until further notice, if that's all right.
So it's -- it says 121, MJ00121 at the bottom. And then this is -- at the top, rather than "Guest," there are a number of people who are listed there. And this is -- there's no date at the bottom of this, correct?
A. Correct.
Q. So you need to try to ascertain the date by figuring out where it falls within the context of the other documents, right?
A. Correct. The -- it would have been, again, 7097

with at least one, most likely two other pieces of paper that -- gate logs.
Q. All right. And for the purpose of -- well, I'll withdraw that.
This shows that at the ranch, there were quite a number of people; is that correct?
A. Yes.
Q. And it says, "CBS Entertainment" there; is that correct?
A. Yes.
Q. Now, it appears that on that list -- I won't read them all, but on that list is "Ed Bradley"; is that right?
A. Yes.
Q. Are you familiar with Ed Bradley of CBS?
A. Yes.
Q. And Jack Sussman, is he a producer at CBS?
You don't know?
A. I have no idea.
Q. That's okay. There are a number of other people associated with CBS there, right?
A. Yes.
Q. And it indicates that all the people associated with CBS, at least down to the point that it's recorded -- let me withdraw that.
It looks like Jack Sussman arrived at 9:40; is that right?
A. Yes. 7098

1 Q. Doesn’t show that he was checked out?
2 A. No.
3 Q. Okay. We assume he’s not still there.
4 A. Yes.
5 Q. Okay. You got Ed Bradley. Can you read
6 that?
7 A. Yes. The times?
8 Q. Yeah, the times.
9 A. 10:30 to -- it’s either 18 or 1900. So
10 6 or 7 p.m.
11 Q. And then the rest of them are 10:30 to
12 7 p.m., is that correct?
13 A. Yes.
14 Q. 10:30 to 7 p.m.
15 Were you on duty that day?
16 A. I don’t know.
17 Q. Do you remember there being a large group of
18 people?
19 A. I don’t remember being there when CBS was
20 there.
21 Q. All right. That’s fair enough.
22 All right. Now we go to page 123, which is
23 dated -- by that I mean MJ00123, which is dated
24 2-9-03, correct?
25 A. Yes.
26 Q. And here we show on the 9th of February,
27 2003, that you have Gavin Arvizo, Star Arvizo,
28 Davellin Arvizo. It shows they were all -- if you 7099

1 just look at those entries, they were all carried
2 over from the night before?
3 A. Correct.
4 Q. And then it shows that they left at about
5 1:30 --
6 A. Yes.
7 Q. -- and apparently left with the person right
8 before there, whose name is, oh, Marie Nicole.
9 A. Yes.
10 Q. That says “Marie Nicole” right above “Gavin
11 Arvizo”?
12 A. Yes.
13 Q. So they all left at 1:30. Doesn’t tell you
14 where they went; is that correct?
15 A. That’s correct.
16 Q. And then they came back at 4:15 in the
17 afternoon?
18 A. Yes.
19 Q. It does appear that there are two other
20 people down at the bottom, Anna Ruiz and looks like
21 Silvana Ruiz. Do you see those?
22 A. Yes.
23 Q. Looks like they left at 1330, which is 1:30,
24 and came back at 4:15, right?
25 A. Correct.
26 Q. And it says “limo” there. Does that mean
27 they went by limo?
28 A. Yes. 7100

Q. And you don't know how the Arvizos traveled on that occasion, do you?
A. No.
Q. You would assume that somebody gave them a ride, though?
A. Yes.
Q. Okay. And then it shows next they're carried over -- that being the Arvizos -- they're carried over. They stayed overnight; is that correct?
A. Yes.
Q. And then we have page MJ00126, which shows 2-10-03, correct?
A. Correct.
Q. And here we see the Arvizos and Marie Nicole staying overnight; is that correct?
A. That's correct.
Q. And it shows there "Mrs. Arvizo," as well, under "Anna Ruiz," correct?
A. Yes.
Q. And it appears that they stayed overnight. Not only were they overnight the night before, but they're staying overnight the next night; is that correct?
A. Yes.
Q. So that's the 10th.
Now, did the -- did the procedures change at some point to where you would start logging in where 7101

people were staying at the ranch?
A. Yes.
Q. All right. I want to show you 2-11-03, which is 00129, Bates stamp number 129. Okay, 2-11-03, correct?
A. Yes.
Q. And here on 2-11 -- oops, sorry -- it appears that Dieter Weizner was staying in Guest Unit No. 4.
A. Yes.
Q. And he stayed overnight?
A. Yes.
Q. If you go down to the next, it shows Janet Arvizo.
A. Yes.
Q. All right. I'm sorry, when I said "the next," I meant to say skip one. It goes down to Janet Arvizo, Guest Unit No. 2.
A. Yes.
Q. Stayed overnight, or she was staying overnight, correct, from the night before?
A. Yes.
Q. But on this day, and again, "this day" being February the 11th, then Arvizo leaves at 5:04 in the afternoon, correct?
A. Correct.
Q. And she comes back at three minutes to 8:00?
A. Correct. 7102

Q. Okay. It shows, “Gavin and Star, house”?
A. Yes.
Q. That means they’re staying at the house,
according to this?
A. Yes.
Q. And then it shows -- now, what does that say
now?
A. It looks like “Daniella.”
Q. Okay. Seems this name changes continuously.
But anyway, whoever that is, D. Arvizo, whatever it
says there, is staying in Unit No. 2; is that
correct?
A. Yes.
Q. And then Marie Nicole is staying in the doll
room, right?
A. Yes.
Q. That’s in the house?
A. Correct.
Q. And Aldo, her brother, is staying in the
house; is that correct?
A. Yes.
Q. Now, Ronald Konitzer is there in Unit No. 1,
correct --
A. Yes.
Q. -- is that right?
And his wife and two children are also
staying there at the ranch in Unit No. 1; is that
correct? 7103

A. Yes.
Q. Now, Units 1, 2, 3 and 4 are the four guest units that are right by the lake; is that correct?
A. That's correct.
Q. And they're just across the front --
A. Grass.
Q. Yeah, the front entrance.
A. The driveway.
Q. The driveway for the entry of the house. They're right across from the front of the house in a building that has four units in it?
A. Yes.
Q. All right. So according to this, Ronald Konitzer, his wife and children, are staying in 1. Davellin's in 2 with Janet. And there are these other two people. Dieter's in 4. And this Mark Lester, whoever that is, is in 3, right?
A. Right.
Q. Now, excuse me one second. I think it got cut off here. Hold on.
Yeah, okay. On this -- at the bottom here, same page, we're still on 129 for February 11th, '03, at the very bottom, you have "Ranch Vehicles," right?
A. Yes.
Q. And I'm going to direct your attention to the one just before the bottom. It says "Katie," and it's kind of cut off, but it's Katie Bernard; is 7104

1 that correct?
2 A. Yes.
3 Q. Do you know who Katie Bernard is?
4 A. Yes.
5 Q. Who is she?
6 A. She's a secretary for the ranch.
7 Q. Works at the ranch?
8 A. Yes.
9 Q. Is she a nice person?
10 A. Very nice.
11 Q. It says, "Black van," right?
12 A. Yes.
13 Q. And what is the black van?
14 A. Black van. It would be the -- it's a ranch
15 vehicle that usually Gary drives.
16 Q. Okay. So it's a vehicle that's used to
17 drive people places, if the guests want to go to
18 town or do something else, or go to the airport or
19 whatever, it can be used for that, correct?
20 A. Yes.
21 Q. All right. Now, it looks like Katie Bernard
22 checks the black van out and then she leaves at four
23 minutes -- at 5:04; is that correct?
24 A. Correct.
25 Q. So it appears that she is taking Janet
26 Arvizo off the ranch, correct?
27 A. They at least left at the same time.
28 Q. If it's down to the minute, they're either 7105

right in the same car or one right behind the other.
A. Yes.
Q. But usually it's the same car, right?
A. Yes.
Q. It would be 1705 by the time you get to the next car, probably, right?
A. Yes.
Q. Now, it looks like Katie Bernard was gone long enough to, say, go to town, drop somebody off and come back, right?
A. Yes.
Q. All right. Now we go to 2-12. And this is page 132, 00132, and it shows February the 12th, 2003; is that correct?
A. That's correct.
Q. All right. Now, here, let's start with the guests. And I take it -- I think it's obvious to everybody, the Xerox machine evidently cut off the edge of the page there, correct?
A. Yes.
Q. Here it appears that there are a number of guests overnight, including Gavin, Star, and Davellin, however her name is spelled, all right?
A. Yes.
Q. We'll call her Davellin, all right?
A. Okay.
Q. It appears that they stayed overnight, correct? 7106

A. Yes.
Q. And then it appears -- and Janet as well, correct? It says Janet, Gavin, Star, Davellin?
A. Yes.
Q. They all stayed overnight, and then they all left at 1:38 in the morning; is that right?
A. That's right.
Q. So when they went to the gate, whoever was driving them stopped the vehicle and said, "We're leaving. And we have Janet, Gavin, Star and Davellin here," correct?
A. Yes.
Q. So the person at the gate, the guard at the gate, could check all these people out at that date?
A. Yes.
Q. There was no secret spiriting of people away. This was checking right out at the gate?
MR. AUCHINCLOSS: Objection; argumentative.
MR. SANGER: That probably was. I'll withdraw it.
THE COURT: All right. I'll sustain the objection.
MR. SANGER: There we go.
Q. In other words, this is done according to procedure. A car comes up; the driver identifies the people in the car?
A. Either the driver or the security officer.
Q. Or the security officer looks in and sees 7107

who it is, and he opens the gate and they go, right?
A. Correct.
Q. All right. If you look at the bottom here, we also have something that says, “Salas,” and it just says, “u-s Salas,” but your bet would be that’s “Jesus Salas,” correct?
A. Yes.
Q. Just got cut off by the Xerox machine. And he checks out the Rolls Royce, right?
A. Correct.
Q. Do you know what kind of Rolls Royce that is?
A. I don’t know which one exactly that is. There was a couple. They were older.
Q. Nice car?
A. Nice, yes.
Q. Nice car, all right. And he checked it out according to the ranch procedures, correct?
A. Correct.
Q. And he checks out -- it goes out at 1:38, correct?
A. Yes.
Q. He does whatever he does, and he gets back, in the Rolls Royce, by 9:08 in the morning, correct?
A. Yes.
Q. Now, Gary Hearn was there. He’s a driver, correct?
A. Yes. 7108

Q. And he was staying overnight; is that right?
A. Yes.
Q. Okay. I think I'm going to go to 135. Hold on one second. Excuse me, Your Honor. I'm sorry. Let me skip ahead a little bit.
Okay. I'm going to go to 149. Show the bottom first. 149.
Now, it says 2-17 through 2-26-03. Is that a typical way to do this?
A. It has -- I've seen it done. I think it says 2-20, but --
Q. 2-20, you're right, I'm sorry. 2-17 through 2-20?
A. The reason we would do something like this would be if we knew we were going to have guests for a certain period of time.
Q. So you have here -- and let me do this, first of all, so we can see it, and then I'll focus in a little better for you.
At the top where it says -- ordinarily you'd put your service people and whatnot up there, that's crossed out and it just says, "Guest List" and the whole page is used for "Guest List"?
A. Yes.
Q. Down through the first two parts of it, in any event; is that right?
A. Yes.
Q. And on the guest list -- let me see if we 7109

1 can get closer and read it.
2 Can you find the one that I did?
3 MS. YU: Yeah.
4 MR. SANGER: Let me borrow that.
5 Q. 2-17 through 2-20, it shows -- well, it
6 looks like Davidia Arvizo was staying overnight, had
7 been staying overnight; is that correct?
8 A. Stayed overnight at least once.
9 Q. All right. And then it shows “out” at 1951;
10 is that correct?
11 A. Yes.
12 Q. Do you know what day she left at 1951, 7:51
13 in the evening?
14 A. No.
15 Q. All right. And then you have Gavin is also
16 staying overnight and leaves at 1951, correct?
17 A. Yes.
18 Q. And you have Janet, who leaves at 2145?
19 A. Yes.
20 Q. And then, again, Star is 1951?
21 A. Yes.
22 Q. And here it shows that the Arvizos are
23 staying -- it says --
24 A. I would assume it’s “Dance Studio.”
25 Q. Staying at the dance studio?
26 A. Yes.
27 Q. All right. And it shows the Cascios, Aldo
28 and Marie Nicole, are staying at the main house; is 7110

that correct?
A. Yes.
Q. And then there's a number of other people there who are staying in the guest units down there. We don't have to go through all of the names, but I see Ann Konitzer and kids is in one.
A. Yes.
Q. With Ronald Konitzer?
A. Yes.
Q. And there are other people staying in the other units, right?
A. Yes.
Q. Okay. Now, if we go to MJ00151, it says 2-18. And it doesn't show all those guests that you showed -- I'm sorry, it does not show all the guests that were shown on page 149 that we just looked at; is that right?
A. Correct.
Q. So since the other one said 2-17 through 2-20, you would assume that some or all of those people were continuing to stay overnight; is that correct?
A. Yes. We most likely had that one that you just showed without the guests, we had that for every day --
Q. Okay.
A. -- up through that period, because we would still need to have written down somewhere where 7111

those people, or general deliveries, contractors or whatever, were still coming in.
Q. If we go to 155, which is for 2-19, it doesn't show all those other guests that were listed, correct?
A. Correct.
Q. But it does show some new guests, for instance, fan club people there?
A. Yes.
Q. Who apparently came onto the ranch for a while; is that correct?
A. For the day, it looks like.
Q. Okay. Now, I'm going to go to 2-20-03, which is 157. And again, if you want to look at any of the pages in between, you're welcome to do it. I'm trying to pick out the ones that count here, but you can look at anything you want.
So this is 2-20-03, and this shows guests as of 2-20. It shows Aja Pryor coming in at 1420 hours.
A. Yes.
Q. Along with Dustin Tucker. Is that her son?
A. I don't know.
Q. Okay. Aja Pryor is Chris Tucker's girlfriend? Or you don't --
A. I have no idea.
Q. Okay. Do you know who Aja Pryor is at all?
A. No. 7112

Q. In any event, whoever they are came in at 1420. At the same time, Gavin, Star and Davellin came in at 1420 hours; is that correct?
A. Yes.
Q. So evidently they left sometime before the time that they returned on 2-20, right?
A. Yes.
Q. And I showed you that other page where it said 2-17 to 2-20; is that correct?
A. Yes.
Q. And it showed some “out” times, but it didn’t tell you the day?
A. Right.
Q. So if somebody were to have left, say, on the 19th, the time was there, but you wouldn’t have the day to determine whether it was the 19th, the 17th, or what?
A. If that’s how that particular paper was kept, yes. I don’t know exactly what was going on, why -- I’m sure we had the extra sheet because we had so many people.
Q. All right.
THE COURT: One thing you need to do is to keep referring to the page number.
MR. SANGER: Did I fail to do that on the last one?
THE COURT: I don’t -- I don’t think you did. Maybe I missed it, but -- 7113

MR. SANGER: Okay. I'm sorry. The one that
I just put up was 00157.
THE COURT: Yes.
MR. SANGER: And that is for 2-20-03.
THE COURT: You did refer to it. I just
missed it. I'm sorry.
Is this a good place to stop?
MR. SANGER: Fine, Your Honor.
THE COURT: All right. We'll reconvene
tomorrow morning at 8:30. Remember the admonition.
(The proceedings adjourned at 11:30 a.m.)
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REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 7058 through 7114 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on April 20, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, April 20, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304